

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 UNITED STATES DISTRICT COURT
2 FOR THE SOUTHERN DISTRICT OF NEW YORK
3 CASE NO. 19-CV-11764 (AT) (KHP)
4

5 ARLENE DELGADO,

6 Plaintiff,

7 vs.

8 DONALD J. TRUMP FOR PRESIDENT,
9 ET AL.,

10 Defendants.

11 LOCATION: Remote Audio-Video
12 Communication

13 DATE: April 12, 2024

14 TIME: 10:00 AM ET to 12:34 PM ET
15
16

17 DEPOSITION OF BRADLEY PARSCALE

18 Taken before Leila Harris, LCR, FPR,
19 Stenographic Court Reporter, Notary Public State of
20 Florida, pursuant to Notice of Taking Deposition in
21 the above-styled cause.
22
23
24
25

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

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*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

INDEX OF WITNESS

BRADLEY PARSCALE

Examination By Ms. Delgado 5

INDEX OF EXHIBITS

Exhibit No.		PAGE
1	Text Communication between Bradley Parscale and AJ Delgado October 17, 2017	22
2	Text Stream Dated May 1, 2018	28
3	Text Message Communication between AJ Delgado and Eric Trump dated April 30, 2018	32
4	E-mail Correspondence from Josh Dawsey dated 12/24/16	45
5	Privilege Log Produced by Eric Trump	51
6	Message String Previously Designated as Confidential	75
7	Screen Shot of a Message from 2022	82
8	E-mail Correspondence from John Phillips	86
9	Mr. Parscale's re-tweet of a tweet by AJ Delgado	96
10	Jason Miller's Response to a re-tweet by Mr. Parscale	97
11	Correspondence Between Jenna Ellis and AJ Delgado	103

Continued Page 4

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

EXHIBIT INDEX CONTINUED

12	E-mail Correspondence Between Bradley Parscale and AJ Delgado from July of 2023	104
13	Text Message from Eric Trump	114
	CERTIFICATE OF OATH	124
	CERTIFICATE OF REPORTER	125
	ERRATA SHEET	126
	Read and Sign Letter	127 1

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

P R O C E E D I N G S

STENOGRAPHER: Pursuant to stipulation,
the oath administered by me here today will
have the same force and effect as if it were
given to the witness while they were physically
present before me in the State of Florida and I
were acting in my capacity as a Florida Notary.

BRADLEY PARSCALE

was called as a witness, and after having been first
remotely duly sworn was deposed and testified as
follows:

THE WITNESS: Yes.

EXAMINATION

BY MS. DELGADO:

Q Good morning, Mr. Parscale.

How are you?

A Hey, AJ.

Q I'm just going to call you Brad if that's
okay?

A That's fine.

Q Okay. Great.

I -- you might have noticed -- by the
way, I want to assure everyone, I'm logged in twice.
That's not an anonymous person logged in as me,
that's just -- I'm logged in from a phone and a

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 computer because I'm going to use the computer for
2 exhibits, for sharing the screen just to make it
3 easier and more seamless.

4 But that's me on both of those
5 screens if you're seeing two Arlene Delgados.

6 Have you been deposed before, Brad?

7 A Ever, yes.

8 Q Okay. I'm going to go over some ground
9 rules with you that are common to most depositions.
10 If you've heard them before, just bear with me.

11 As you know, if you need to take a
12 break for any reason, let me know, going to the
13 bathroom, get some water. You just can't talk to
14 your counsel about your testimony during that break.
15 I might be taking notes, looking down while you're
16 talking. It's not that I'm not listening to your
17 question or disrespecting you in any way, I'm just
18 taking notes, and that's just the way I work. So
19 please don't read into that.

20 If you don't understand a question,
21 please let me know, and I'll rephrase it. So if you
22 answer, I'm going to assume you understood the
23 question.

24 Does that all make sense?

25 A Yes, ma'am.

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 Q Okay. Your deposition notice had an
2 attachment requesting that you provide certain
3 documents for this deposition.

4 Were you aware of the attachment to
5 the notice?

6 MR. WOODWARD: We don't have any
7 documents, Ms. Delgado.

8 MS. DELGADO: You have no documents for
9 any of the requested categories?

10 MR. WOODWARD: No, ma'am.

11 BY MS. DELGADO:

12 Q Could you please state your full name for
13 the record?

14 A Bradley James Parscale.

15 Q Where do you reside? You don't need to
16 tell me the address on the record, just a city and
17 state please?

18 A Midland, Texas.

19 Q Okay. And your lawyer in this matter is
20 Stanley Woodward?

21 A Yes, ma'am.

22 Q And who is paying for Mr. Woodward to
23 represent you in this matter?

24 MR. WOODWARD: Don't answer that.
25

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 MS. DELGADO: Mr. Woodward, are you
2 claiming a privilege?

3 MR. WOODWARD: Why is that relevant?

4 MS. DELGADO: It is relevant to this case
5 and Mr. Parscale's ability to be credible in
6 this matter. So I'm going to ask unless you're
7 claiming that that's attorney/client privilege,
8 which it is not.

9 MR. WOODWARD: Okay. I'm directing the
10 client -- my client not to answer the question.

11 MS. DELGADO: On what ground?

12 MR. WOODWARD: My advice.

13 MS. DELGADO: Mr. Woodward, he could only
14 be directed not to answer in you're asserting a
15 privilege.

16 MR. WOODWARD: Okay. We can spend time
17 arguing about this. Why don't you ask all the
18 questions you have in the time that you have.
19 And we can circle back on any that I've
20 directed him not to answer.

21 MS. DELGADO: Again, you're directing him
22 to answer based on a privilege of any kind?

23 MR. WOODWARD: Ms. Delgado, we can take
24 this up with the Court or we can move on.

25 MS. DELGADO: You're telling your client

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 not to answer a question that I've just posed
2 and you're stating what the privilege is, which
3 you know is not permitted. And you're
4 directing me to move on.

5 Are you --

6 (Simultaneous speakers)

7 MS. DELGADO: -- telling your client to
8 not answer a question?

9 MR. WOODWARD: Yes, ma'am.

10 MS. DELGADO: Even though there's no
11 privilege?

12 Are you claiming, sir, that that is
13 privileged information?

14 MR. WOODWARD: No, ma'am. I'm claiming
15 that it's not relevant to the litigation.

16 MS. DELGADO: And as you know, he still
17 has to answer.

18 MR. WOODWARD: No, ma'am, he doesn't. I
19 directed him not to.

20 MS. DELGADO: Mr. Woodward, we're going to
21 have to -- I'm not going to continue a
22 deposition in this manner. And I don't have to
23 continue a deposition based on your direction
24 that I continue when you're not asserting a
25 privilege, and you're directing your client to

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 violate the rules and not answer.

2 The only basis for not answering is
3 privilege.

4 MR. WOODWARD: Ms. Delgado, you have two
5 and a half hours. I would suggest that we move
6 on and we can circle back to questions that
7 I've directed him not to answer.

8 MS. DELGADO: Mr. Woodward, just to be
9 clear, I'm not sure if you saw the order that
10 the judge entered yesterday. If we don't
11 finish in two and a half hours, the judge said
12 I have every right to go back to her and ask
13 for more time.

14 So we have 2.5 hours today. I certainly
15 intend to ask for more time if I don't get the
16 answers I need in the two and a half hours.
17 And I will also note for the record that
18 Mr. Woodward sent me an e-mail last night,
19 quite improperly asking me to send him the
20 exhibits that I plan to use in advance.

21 I've never heard of an attorney asking for
22 exhibits to be sent prior to the deposition.
23 So I want to make that clear on the record, as
24 well. But we can -- we can circle back.
25 That's fine. Let's do that.

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 BY MS. DELGADO:

2 Q So if I ask you, Brad, how have you paid
3 for this deposition; for your representation in this
4 deposition, have you paid for it?

5 A No. No, I've --

6 Q Sorry?

7 A No, I've not.

8 Q Okay. How did you prepare for this
9 deposition?

10 A Just talking to Stanley, the lawyer.

11 Q Did you speak to Mr. Blumetti?

12 A Who's that?

13 Q The Trump campaign attorney.

14 A I never met him.

15 Q Okay. Did you speak to Mr. -- I'm sorry,
16 I don't want to mispronounce the name, Mr. Googleman
17 (sic)?

18 A I don't know who that is either, AJ.

19 MR. WOODWARD: Gavenman, is that --

20 MS. DELGADO: Gavenman, I apologize,
21 Gavenman.

22 THE WITNESS: I just met him ten minutes
23 ago.

24 BY MS. DELGADO:

25 Q Okay. Thank you.

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 Brad, do you still consider yourself
2 a supporter of Donald Trump's candidacy?

3 A Yes. I support the republican party.

4 Q The question was: Do you support Donald
5 Trump's candidacy?

6 A Yes, I support him as the -- as the head
7 of the Republican party.

8 Q Okay.

9 How much money did you earn from the
10 Trump campaign in 2016, including you and your
11 companies?

12 A I don't remember the exact number. It's
13 been a long time. But you're talking about gross
14 revenue or profit?

15 Q Sorry, your internet is a little shaky.
16 Can you say -- I missed the second part?

17 (Simultaneous Speakers)

18 THE WITNESS: I said did you ask for gross
19 revenue or did you ask for profit?

20 BY MS. DELGADO:

21 Q We can -- thank you. That's a good
22 clarification.

23 Profit, please.

24 A A few hundred thousand dollars.

25 Q What about gross revenue?

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 A It depends whether -- so it depends on the
2 accounting method. And if you take the accounting
3 method with advertising or without advertising,
4 which is two different accounting methods, the one
5 that's publicized is the one with accounting
6 methods. That one was over a hundred million.

7 Q Okay.

8 A If you take out the -- if you take out the
9 advertising, I believe it was less than ten million
10 dollars.

11 Q Okay. What --

12 (Simultaneous Speakers)

13 BY MS. DELGADO:

14 Q Okay. What about in the period between
15 2016 and 2020, ballpark?

16 A I could not do that without looking at
17 something or -- that's just -- yeah, I -- it just
18 was irrelevant to me. I -- I don't remember. It
19 could -- I would be way off, AJ.

20 Q Is it over a million?

21 A I -- if you know, tell me. I don't think.

22 Q You don't know how much you earned?

23 A I mean, you're talking about four years
24 ago -- about six years ago in a period of time. I
25 don't remember. I was also selling my company

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 because my company got destroyed by the campaign. I
2 was building new companies and I was trying to
3 survive what happened in '16.

4 So I just -- you know, you can ask me
5 that question. We would have to almost have a
6 forensic accountant figure it out because I lost my
7 company in that period of time.

8 Q You bought a significant amount of
9 property, did you not, real estate property?

10 A In what period of time?

11 Q Following the 2016 campaign.

12 A I -- yes, I did make some investments.

13 Q Okay.

14 A If you'd like me to tell you why, I can.

15 Q Most of those are public record; correct?

16 MR. WOODWARD: Repeat the question,
17 please.

18 MS. DELGADO: Sorry?

19 MR. WOODWARD: Could are you repeat the
20 question, please?

21 BY MS. DELGADO:

22 Q Most of your purchases are public record;
23 is that correct?

24 A I -- I don't know what's public and what's
25 not, I don't.

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 Q I'm just trying to clean it up. These are
2 things we can look up so that's why I'm asking.

3 You currently -- tell me about what
4 you do currently? Professionally?

5 (Simultaneous speakers)

6 THE WITNESS: I run -- I operate multiple
7 software companies to try to build technology
8 to fight cancel culture.

9 BY MS. DELGADO:

10 Q Is one of those campaign Nucleus?

11 A Yes, ma'am.

12 Q Is the Trump campaign a client?

13 A Yes, it is.

14 Q Okay. So you currently receive revenue
15 from the Trump campaign via your company?

16 A Yes, ma'am.

17 Q Okay. You want to keep the Trump campaign
18 as a client?

19 A I want to keep all my clients.

20 Q Fair enough. Okay.

21 By the way, if I interrupt you, it's
22 just that -- sometimes there seems to be a little
23 bit of a delay. Just let me know or raise your hand
24 if I'm interpreting you.

25 A It's fine.

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 Q I certainly don't intend to.

2 Tell me a bit, please, about how it
3 is your came to work for the Trump campaign in 2016?

4 A I mean, it guess way back. So back -- all
5 the way back to 2009, '10 range. And I was blessed
6 enough to have someone, you know, hand my number out
7 as a reference on an airplane to a woman name Kathy
8 Kay. Katty Kay ended up becoming the head of Trump
9 International Real Estate.

10 During the period of time, I bid for
11 a website for the real estate group. Ended up
12 winning it by significantly underbidding it and
13 taking the -- you know, the hope that they're --
14 name ID in marketing and their promise to -- to
15 promote me would be more than worth the money that I
16 lost making the first website. That led to multiple
17 websites for multiple family members. And then
18 eventually more advertising and marketing and
19 branding.

20 And that led then to 2015, receiving
21 an e-mail from Amanda Miller stating Trump's
22 thinking about running for president, would you like
23 to help -- to help him. And I replied back, yeah,
24 sure.

25 Q Okay.

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 A In which I bid \$1,500 as a start.

2 Q You previously mentioned a story to me
3 about Eric Trump calling you and telling you that
4 was -- you were charging too little for your
5 services; do you recall that?

6 MR. WOODWARD: Objection to form.

7 THE WITNESS: Yeah, way back -- way back
8 at the beginning, Eric Trump called me. I
9 don't remember the exact language that I can
10 give it, you know, under oath. I would say
11 that synopsis was either you're kind of stupid
12 or you're charging too little.

13 And I told him, sir, that this was an
14 honor to work for their family. And that --
15 that I respected their marketing prowess. And
16 that I was going to do all the work myself so
17 my only cost was my time.

18 BY MS. DELGADO:

19 Q So you were doing a lot of website work
20 for the Trump organization. Would that be a
21 generally correct description?

22 A I mean, you're staying a lot. I would a
23 decent amount. It depends on what year. At that
24 point, I would say it's a little amount of my work.
25 It was probably less than four -- you know, five

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 percent of my -- my overall time and work effort.

2 Q Sure. Sorry. What I was asking was
3 more -- the work was for the Trump organization; is
4 that correct?

5 A Yes, I worked -- I worked for Trump -- but
6 I received checks from different organizations along
7 the time, I believe. I think Trump -- actually it
8 was not the Trump Org. That's actually incorrect.

9 You said that -- I didn't mean that.
10 I was working for Trump International Real Estate,
11 Realty, which was its own organized separated from
12 Tromp Org. So I don't believe I ever was paid from
13 the Trump Org. But I'd have to go back and look at
14 my records.

15 Q Okay. Got it.

16 And was that -- were -- did you work
17 closely with -- most closely with Don Jr., with Eric
18 or with Ivanka, if anyone?

19 A It depends on the year. Are you talking
20 about year one?

21 Q We can go year-by-year, sure?

22 A Year one's Eric.

23 Q Okay.

24 A The first couple of years would be Eric.

25 Q Okay.

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 A And then -- then I got to know Ivanka.
2 Then I got to know -- then I went to Melania next
3 and then Ivanka. I really never worked with Don Jr.
4 before the campaign.

5 Q Got it. Okay.

6 And you joined the campaign in what
7 month and year?

8 A Exploratory committee or the campaign? It
9 depends on what you're asking.

10 Q The campaign effort.

11 A The -- I can't remember really when the
12 campaign officially started, but whenever the
13 campaign officially started, it would have been that
14 week or day. My first job was with the exploratory
15 committee.

16 Q So were you --

17 (Simultaneous speakers)

18 THE WITNESS: It's February for the
19 exploratory committee. I can't remember -- I
20 don't remember when he came down. I think it
21 was June -- some time mid June right after his
22 birthday is when he came down the escalator and
23 we formed the committee.

24 His birthday is June 14th, I think
25 June 16th. But I'm guessing there based off of

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 his birthday.

2 BY MS. DELGADO:

3 Q Okay.

4 A It was a long, long time ago.

5 Q Do you remember much from the 2016,
6 campaign?

7 A I remember parts, yes. It's been a
8 decade, a few things have happened in between.

9 Q Do you remember any impressions of my work
10 or my TV appearances or anything about me from the
11 campaign?

12 A Yes, ma'am.

13 Q Could you share what those are?

14 A I mean, if you would ask me specifics,
15 maybe it would help, but yeah. I remember you being
16 on TV. I remember you being good.

17 Q Okay. Fair enough. Thank you.

18 Anything else? Any interactions with
19 me? Anything positive or negative that you recall?

20 A I mean, AJ, the only time I really
21 remember us interacting in 2016 is a couple times in
22 the -- I don't remember what it's called, the war
23 room area; right?

24 Q Right.

25 A And you trotting around, you know, and

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 everything. So it's -- you know, back and forth to
2 Jason's office is pretty much all I remember.

3 And then you talked to me a couple
4 times. I don't remember what you said. You told me
5 earlier -- other times what you told me you said,
6 but I don't remember.

7 Q Sorry. Can you repeat that?

8 A I said you told me other times after that
9 like what I said -- what you said to me. I don't
10 have any memory of what you said.

11 Q Okay. All right. Let's do -- do you
12 recall in October 2017, our connecting on the phone
13 about a job with the America First PAC?

14 A I couldn't tell you what the date was, but
15 I have a memory of calling you or talking to you
16 about the job at America First. But I couldn't tell
17 you when exactly and what was said, obviously.

18 Q Do you recall why you and I suddenly
19 talked in October 2017 -- let me show you an
20 exhibit. I'm sorry, you were shaking your head?

21 A I don't -- I don't recall. I don't
22 remember what led to it.

23 Q Okay.

24 A I don't remember the aftermath.

25 Q Okay. Let do our first exhibit.

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 (Exhibit 1 was marked for
2 identification)

3 BY MS. DELGADO:

4 Q Okay. I'm going to share my screen. If
5 you want to look at the other -- the other log in.

6 A AJ, I need to get my glasses. My vision
7 at 50 is going down.

8 Q I'm right there with you. Go ahead.

9 Okay. So I'm going to mark as
10 Exhibit 1, and these are texts, Brad, between the
11 two of us. And the date of October 17, 2017.

12 So this is about ten months after
13 inauguration.

14 If you can see, I'm just going to
15 scroll down.

16 MR. WOODWARD: Jared, as the lawyer for
17 the campaign, I assume you're going to be
18 objecting based on form here?

19 MR. BLUMETTI: I'm also going to be
20 objecting on the fact that these were never
21 produced during discovery, yes.

22 MR. WOODWARD: You just might want to make
23 a record of that.

24 MR. BLUMETTI: Ms. Delgado, were any of
25 these messages exchanged with us during

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 discovery? I don't recognize any these.

2 MS. DELGADO: I'd have to go back and
3 check the production as much as you. I don't
4 think -- it is a third-party witness. I don't
5 see why these would necessarily have to be
6 produced during discovery in terms of what you
7 requested.

8 They will be produced.

9 (Simultaneous speakers)

10 MR. BLUMETTI: You did produce certain
11 communications with Mr. Parscale so -- but not
12 these. So I think you've already conceded that
13 your communications with him are relevant.

14 We're going to object to the extent --

15 (Simultaneous speakers)

16 MS. DELGADO: Not necessarily. We can
17 take that up later.

18 MR. BLUMETTI: We're going to object to
19 the extent that you're using documents that
20 were not produced during discovery. These are
21 not Bates stamped. I'm also going to object to
22 the form of your questions.

23 You can go ahead.

24 MS. DELGADO: Go ahead. Okay.

25

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 BY MS. DELGADO:

2 Q Brad, are you able to see?

3 MR. WOODWARD: No. We only saw the first
4 page.

5 Can you scroll down for us, please?

6 MS. DELGADO: Okay.

7 BY MS. DELGADO:

8 Q Are you reading along as I scroll?

9 A Yes.

10 Q Okay. Great.

11 You say what -- we get to the one
12 that says October 19 and you write, "Hey ya, talk to
13 team at America First about you. They'll call you
14 back in the a.m."

15 And I reply with a thumbs up. Okay.

16 A It sounds -- I mean, you're showing me so
17 it sounds like accurate.

18 Q Okay. So now does that help refresh your
19 recollection about our chatting regarding the job at
20 America First?

21 MR. WOODWARD: Objection to form.

22 THE WITNESS: I -- I -- AJ, it doesn't --
23 it doesn't remind me like of our -- if I called
24 you or somebody else called you. But, I mean,
25 I was aware of this whole event. So yes,

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 this -- this goes along with what I was saying
2 which was I knew that I had, you know, gotten
3 you a job offer, offered you a job. I don't
4 even remember what my position at the PAC was
5 at that moment. But like, yes, I helped you
6 get a job there.

7 BY MS. DELGADO:

8 Q Do you remember Eric telling you to give
9 me a job at the PAC?

10 A I don't recall him actually telling me to
11 give the job.

12 MR. WOODWARD: Just wait to answer so that
13 Jared could object.

14 THE WITNESS: No. I don't recall him
15 telling me to give you the job.

16 BY MS. DELGADO:

17 Q So is it your position that ten months
18 into 2017, you suddenly decided to give me a job at
19 the PAC?

20 MR. BLUMETTI: Objection to form.

21 THE WITNESS: I'm just saying that I don't
22 remember who told me. I -- I do remember
23 having conversations about giving you a job,
24 but I can't specifically tell you exactly who
25 called me first, whether it was my idea, their

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 idea, I called them first. Who called who
2 first; I can't remember that.

3 BY MS. DELGADO:

4 Q So why did you and I suddenly have a
5 conversation ten months after inauguration about the
6 PAC?

7 MR. BLUMETTI: Objection to form.

8 (Simultaneous speakers)

9 THE WITNESS: I -- I think that --
10 answer --

11 MR. WOODWARD: If you recall.

12 THE WITNESS: Yes. I mean, what I recall
13 is that --

14 MS. DELGADO: I'm going to object. Excuse
15 me, Brad. I'm going to object to what appears
16 to be Mr. Woodward coaching the witness mid
17 answer and hinting that he state he not recall.
18 I want to make that clear for the record.

19 Mr. Woodward, I would ask that you not do
20 that again, especially mid answer.

21 Go ahead, Brad.

22 MR. BLUMETTI: Ms. Delgado, I'd ask that
23 you not ask the witness a question you've
24 already asked him once before.

25 (Simultaneous speakers)

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 MS. DELGADO: And you have -- you have an
2 ability to object to that. An objection exists
3 for that. But I've not seen a -- a witness be
4 coached, if you recall, quote unquote, mid
5 answer, especially mid answer.

6 So, please, don't do that again.

7 Brad, go ahead.

8 THE WITNESS: It's the way you're framing
9 the question. I don't remember who first did
10 it. But yes, multiple people had conversations
11 about you working there. That I can actually
12 say on the record, I remember having
13 conversations with multiple people about you
14 working there. And I agreed to do that because
15 I thought you were talented. And I thought it
16 was the best.

17 But your first question asked me who
18 first, and I don't remember who was first.

19 BY MS. DELGADO:

20 Q Did you have me interview for the job?

21 A AJ, I don't remember. You'd probably
22 remember that, I don't. I don't remember one. I
23 don't recall.

24 Q Sorry, you said you don't remember?

25 A I don't -- I don't remember. I -- I have

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 no idea.

2 Q Do you recall having an interview?

3 A No, I don't.

4 Q Did you speak to Eric Trump as one of the
5 individuals you mentioned earlier --

6 A Yes.

7 Q -- having a conversation -- I'm sorry, go
8 ahead.

9 A Yes.

10 Q Okay. I want to show you -- let me stop
11 sharing.

12 MS. DELGADO: And I apologize to everyone
13 for my being the least tech savvy person you
14 will ever come across on Zoom. So please bear
15 with me.

16 Okay. Hang on. I'm sharing screen.

17 Okay. I'm sharing another exhibit, I'm
18 going to mark this as Exhibit 2.

19 (Exhibit 2 was marked for
20 identification)

21 MR. BLUMETTI: I'm also going to object to
22 the extent that these messages were also not
23 produced during discovery.

24 Were these Bates stamped and produced,
25 Ms. Delgado?

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 MS. DELGADO: No. Could you tell me what
2 response -- what discovery request they were
3 responsive to when you're saying you object
4 that they were not produced during discovery.
5 I'd be happy to take a look.

6 MR. BLUMETTI: Absolutely. I will send
7 you those. And also you have an obligation
8 under Rule 26 to produce everything that you're
9 going to use to support your claims in the
10 case. So it would fall under that even if it's
11 not responsive to a specific request.

12 I think you've already produced messages
13 with Mr. Parscale in this litigation on some of
14 the same topics, conceding that they are
15 already relevant. It looks like you've
16 selectively produced messages. We would ask
17 that you produce all messages that you have in
18 your possession.

19 MS. DELGADO: Mr. Blumetti, even yesterday
20 I'm still receiving responsive documents from
21 you firm. Discovery is ongoing. You will
22 receive everything that's utilized in these
23 depositions, of course, but discovery and
24 finding those documents is ongoing. As you,
25 yourself, given that I receive a constant

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 stream of "We just found these" is a testament
2 to.

3 So these will be produced. Anything used
4 here will be produced.

5 MR. BLUMETTI: And any other messages that
6 you have in your possession.

7 MS. DELGADO: Does everybody see have the
8 screen?

9 If we could get back to the exhibit.

10 BY MS. DELGADO:

11 Q Brad, do you -- I'm going to mark this as
12 Exhibit 2.

13 A Okay.

14 Q This is a text stream.

15 MR. WOODWARD: Ms. Delgado, can you scroll
16 through it so we can see the document before
17 he's asked about it?

18 MS. DELGADO: Oh, is it not showing?

19 MR. WOODWARD: We see two text messages.
20 If there's more than two text messages, I would
21 like to review the whole document before we're
22 asked about it.

23 MS. DELGADO: This is what I have.

24 MR. WOODWARD: Okay.

25

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 BY MS. DELGADO:

2 Q Okay. Brad, do you see the message is
3 dated May 1, 2018?

4 A Yeah.

5 Q Okay. And do you recall the context of
6 this?

7 A I can only assume what it is. I don't
8 remember these text -- I mean, I can tell you that
9 I've always been sorry what happened to you, but
10 like I don't know -- I don't remember what the --
11 the horror of the last 24 hours is. I don't
12 remember.

13 Q Okay. I can speed things up to represent
14 that what I'm referring to is I had just been
15 terminated with no reason given from the PAC.

16 Does that help refresh your
17 recollection now?

18 MR. BLUMETTI: Objection to form.

19 BY MS. DELGADO:

20 Q Just -- Brad, just to be clear, if you
21 could for the court reporter, instead of -- and I do
22 the same thing, everyone does -- instead of nodding
23 or shaking your head, say yes or no because she
24 needs to record.

25 A I said -- I said, yes, but I didn't wait

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 for Jared to object, and I said it at the same time.

2 So yes.

3 Q Okay. Thank you.

4 And you write, "Thank you. I'm sorry
5 all this happened to you."

6 Is that accurate?

7 A Yes.

8 Q Did you have a conversation with Eric
9 Trump that day or the day prior or about my
10 termination from the PAC?

11 A I do not recall that. I don't know.

12 Q You don't recall. Okay.

13 I'm going to -- I'm going to -- let's
14 see here.

15 MS. DELGADO: I'm going to mark this as
16 Exhibit 3.

17 (Exhibit 3 was marked for
18 identification)

19 MS. DELGADO: Mr. Blumetti, these were
20 produced both -- I believe by myself and by
21 Mr. Eric Trump when he was deposed. I think
22 you've seen these before.

23 MR. BLUMETTI: Can we please use exhibits
24 that have been Bates stamped then as opposed to
25 using a whole different exhibit that has not

April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale

1 | been Bates stamped?

2 MS. DELGADO: I don't think Mr. Eric
3 Trump's exhibits were -- were Bates stamped.

4 BY MS. DELGADO:

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5      Q      Brad, I'm going to show you, is a text
6      stream --
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7 MR. WOODWARD: Ms. Delgado, we're going to
8 take a quick break.

9 MS. DELGADO: Can I finish my question?

10 MR. WOODWARD: You haven't asked a
11 question.

12 MS. DELGADO: We're mid question.

13 MR. WOODWARD: No, we're not. We're
14 taking a quick break.

15	(Simultaneous speakers)
----	-------------------------

16 MS. DELGADO: Yes, we are. I just put an
17 exhibit on the screen and you interrupted me.
18 I said I'm showing you a screen and you
19 interrupted me. I'd like to finish my
20 question.

21 BY MS. DELGADO:

22 Q Brad, there is -- on the screen I'm
23 marking as Exhibit 3, as I said already, is a text
24 string between myself and Eric Trump dated April 30,
25 2018.



*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 Could you please read the last
2 message by Eric, the first line?

3 MR. BLUMETTI: Question, please.

4 THE WITNESS: Are you asking me to read it
5 out loud or are you asking me to read it? Like
6 I read it.

7 BY MS. DELGADO:

8 Q Yes. And it is says, "AJ, I'm truly sorry
9 this has happened to you."

10 Is that correct?

11 A Yeah.

12 Q And now I want to refresh back to Exhibit
13 2, I believe it was Exhibit 2, which is what you
14 wrote and that was, "I'm sorry all this happened to
15 you."

16 Is that correct?

17 A Yes.

18 Q Would you say the wording is very similar?

19 MR. BLUMETTI: Objection to form.

20 THE WITNESS: The word "sorry"? AJ, I'm
21 real sorry, I don't know. Those are -- those
22 are weeks apart. I don't know.

23 I don't know what that means. I don't
24 know what you -- the word sorry is in both,
25 yes.

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 BY MS. DELGADO:

2 Q Sorry, did you say they're weeks apart?

3 A Aren't they?

4 Q Well, I want to make sure you're looking
5 at the right thing. One is April 30, 8:51 p.m. the
6 other one is May 1st, 8:41 a.m.

7 They're about 12 hours apart.

8 (Simultaneous speakers)

9 THE WITNESS: Okay. All right.

10 BY MS. DELGADO:

11 Q Sorry, what did you say, Brad?

12 A I don't know what you're trying to ask me
13 to do other than they both say sorry, yes.

14 Q I just wanted to make sure you're looking
15 at the right thing since you said they were weeks
16 apart.

17 A Okay. Sorry, I thought it was like the --
18 I thought it said the 17th or something. I don't
19 remember the last one.

20 Q Fair enough.

21 So would it be correct to say they're
22 about 12 hours apart?

23 A You -- I take your place on that. Yes.

24 (Simultaneous speakers)

25

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 BY MS. DELGADO:

2 Q Is it still your position that you did not
3 speak to Eric Trump about my --

4 (Simultaneous speakers)

5 MR. BLUMETTI: Objection.

6 THE WITNESS: I don't remember.

7 MR. WOODWARD: That misstates what he was
8 asked, Ms. Delgado. Or what he -- he answered,
9 Ms. Delgado.

10 BY MS. DELGADO:

11 Q Did you speak to Eric Trump?

12 A I don't remember.

13 Q You don't remember. Okay.

14 A It's six years ago.

15 Q Did you speak to an attorney?

16 A I don't remember.

17 Q Have you ever spoken to an attorney about
18 me or anything involving me, aside from your, of
19 course, attendance here today?

20 A Yes.

21 Q Okay. What was that about?

22 MR. WOODWARD: Objection.

23 MR. BLUMETTI: Don't -- everybody
24 attorney-client privilege. I'm sorry, Stanley.
25

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 MS. DELGADO: Not -- nope, not asking what
2 was said or what the conversation was. I'm
3 asking what it pertained to. What lawsuit?
4 What issue? That's not privilege.

5 MR. WOODWARD: You asked if he'd ever
6 spoken to an attorney about you, so he said,
7 yes. So now you know what it pertained to.

8 MS. DELGADO: No, about me, sir, can
9 literally be a conversation with an attorney on
10 Twitter about whether I had a good performance
11 on TV. I'm asking what was it about, i.e., was
12 it about, for instance, a lawsuit or the PAC
13 termination.

14 I'm permitted to ask that. That's not
15 privileged.

16 MR. WOODWARD: Okay. I'm going to have to
17 talk to him about that to understand whether
18 his answer is going to reveal privilege or not.
19 So we'll have to take a break.

20 MS. DELGADO: Fair enough. Fair enough.
21 But I -- but clearly I need to narrow it down
22 because Brad knows many individuals who happen
23 to be attorneys, and they could be talking
24 about anything regarding me that has nothing to
25 do with a lawsuit or potential lawsuit.

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 So that -- so you understand that is what
2 my narrowing down is about.

3 So --

4 (Simultaneous Speakers)

5 MS. DELGADO: So if you'd like to take a
6 minute and discuss it with him, I'm happy to
7 wait.

8 MR. WOODWARD: Do you want to rephrase the
9 question?

10 MS. DELGADO: Well, I think it's --

11 BY MS. DELGADO:

12 Q Mr. Parscale, you said you had
13 conversations or communications about me with
14 attorneys in the past, aside from, obviously, your
15 appearance here today; is that correct?

16 A Yes.

17 Q Okay. And without telling me the content
18 of those communications, what were they about or
19 pertaining to?

20 MR. WOODWARD: I'm still going to object.
21 Why don't you ask him who he spoke with. And
22 if it was on Twitter, then I won't have any
23 concerns.

24 MS. DELGADO: Well, I wouldn't limit it to
25 Twitter.

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 MR. WOODWARD: Why don't you ask him --

2 (Simultaneous speakers)

3 BY MS. DELGADO:

4 Q Let's go -- what -- who -- what attorney
5 did you speak with that you're recalling?

6 A It would have been the campaign attorneys,
7 my campaign attorneys.

8 Q What year, approximately?

9 A My guess it would be -- I mean, I talked
10 to them multiple times over the years about you,
11 depending on the situation. But they would always
12 have been my campaign attorneys or my personal
13 attorney. I have a lot of attorneys unfortunately
14 after Trump world.

15 They would have all been my
16 attorneys. I don't know exactly who you're talking
17 about.

18 If you want to ask me if I spoke to a
19 certain person, ask me. I don't know who that would
20 have been.

21 Q Do you recall who the attorneys were that
22 you spoke to about me?

23 A The only one I remember multiple times is
24 Alex Cannon. Who's both --

25 (Simultaneous speakers)

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 BY MS. DELGADO:

2 Q Was that about -- I'm sorry. Go ahead.

3 A He was my campaign attorney and then
4 became my personal attorney after leaving the
5 campaign.

6 Q Okay. Was that about my lawsuit or
7 potential lawsuit against the campaign?

8 MR. WOODWARD: Don't answer that.

9 MS. DELGADO: I'm allowed to ask what
10 the -- the content of -- not the content
11 specifically, but what it pertained to not
12 whether -- does she have bad hair. They can
13 have a conversation about anything pertaining
14 to me that might not be legally related.

15 So I -- that -- I don't believe that's
16 privileged at all. The question is not trying
17 to get to the core of what they discussed.

18 MR. WOODWARD: Ms. Delgado, I'm
19 instructing my client not to answer questions
20 about his conversations with his attorneys.

21 MS. DELGADO: I'm allowed to ask if it was
22 about or related to the Trump campaign lawsuit.

23 MR. WOODWARD: Ms. Delgado --

24 (Simultaneous speakers)

25 MR. WOODWARD: Ms. Delgado, I'm

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 instructing my client not to answer questions
2 about discussions he had with his attorneys.

3 MS. DELGADO: But I'm not asking him to
4 detail the discussions or what the
5 communications were with the attorneys. I'm
6 asking what the communication was about.

7 Mr. Woodward, I trust you're familiar with
8 a privilege log. A privilege log has to
9 identify when communications with an attorney
10 were had, what they were about and who the
11 attorney was granted you do not then disclose
12 the actual communications, but that is
13 revealed.

14 Now, are you telling me privilege logs
15 violate attorney-client privilege? Please, we
16 have a limited amount of time today, so I'd
17 appreciate not making frivolous objections.
18 I'm asking the date. This is standard
19 privilege log information. Who the attorney
20 was and what the general content or issue was
21 that was being discussed. Not the actual
22 communications.

23 MR. WOODWARD: I -- I strongly suggest
24 that we move on.

25 MS. DELGADO: Are you still claiming that

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 that's privileged?

2 MR. WOODWARD: Yes, ma'am.

3 BY MS. DELGADO:

4 Q Were any of those communications, Brad, in
5 writing, e-mails for instance, text messages?

6 A I don't remember. The ones that I think
7 that I remember were not -- they were phone calls.
8 But they were -- I'm not saying they were not any,
9 but the ones I remember were by phone.

10 Q And the attorney was Alex Cannon?

11 A That's the one I remember.

12 Q Any others?

13 A AJ, I don't even remember the names of our
14 other attorneys.

15 Q Do you remember speaking to a Larry Rosen?

16 A I don't think I've ever spoke to Larry.
17 If I did, I don't remember. I possibly did. I know
18 the name.

19 Q You know the name?

20 A I mean, it's been on TV -- I don't know if
21 I know it from TV or if I know it from myself.

22 Q Let's' -- okay.

23 Do you recall why or did you ever --
24 let me rephrase that.

25 Do you have any understanding or

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 information as to why I was terminated from the PAC?

2 MR. WOODWARD: Ms. Delgado, are asking
3 about his conversations with his lawyers or
4 have we moved on?

5 MS. DELGADO: No. I'm going to move on.
6 I'm trying to save time. We'll have to
7 recircle back to that with the judge or at the
8 end of the depo.

9 MR. WOODWARD: So this question is
10 exclusive of any conversations he had with his
11 attorneys; correct?

12 MS. DELGADO: Yes.

13 MR. WOODWARD: Okay. Could you restate
14 the question, please?

15 THE WITNESS: I can read --

16 BY MS. DELGADO:

17 Q I'm sorry, what was that?

18 A I said I'm done reading these. I can take
19 my glasses back off?

20 Q Oh, okay. Okay.

21 A Because I can't really see you when I have
22 my glasses on versus reading. So I apologize.

23 Q Thank you.

24 Do you have any recollection or
25 information regarding reasons why I was terminated

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 from the PAC?

2 A I don't recall at -- at this point.

3 Q Do you recall if you inquired?

4 A I don't remember if I did. I might have,
5 who knows.

6 Q Is that something you would have inquired
7 about given your texting that you were sorry that
8 this happened?

9 A I could have called. I probably would
10 have. I don't know.

11 MR. WOODWARD: Give me a minute to object.

12 THE WITNESS: I'm sorry.

13 MR. WOODWARD: That's okay.

14 BY MS. DELGADO:

15 Q I'm going to stop sharing. Tech savvy.

16 And okay. And share screen again.

17 Okay. Brad, I have up on the screen
18 an e-mail that I recently came across. It's an
19 e-mail from Josh Dawsey, a reporter who was then at
20 Politico, to other colleagues of his. And it's
21 dated December 24, 2016.

22 If you look down I highlighted a part
23 that I wanted you to -- to see and read quickly. It
24 says, "Trump became aware of the issue. Trumps was
25 not happy, didn't want either of them brought on.

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 (Jason Miller or AJ)."

2 Do you see that?

3 MR. WOODWARD: Ms. Delgado, if we could
4 have a minute to just review the document in
5 full, please.

6 MS. DELGADO: Of course.

7 (Exhibit 4 was marked for
8 identification)

9 MR. BLUMETTI: I believe the same document
10 has been marked before.

11 MS. DELGADO: I believe I showed this one
12 in Eric's deposition. I don't think it was --
13 I'm not sure if this was -- I just recently
14 found it so I doubt this has been Bates
15 stamped.

16 Mr. Blumetti, you've seen -- you saw this
17 one in Eric's deposition, I think.

18 MR. BLUMETTI: Right. I was just saying
19 if it was marked at that deposition we can keep
20 it the same exhibit.

21 MS. DELGADO: I just don't recall what
22 number it was in that deposition. So might as
23 well reintroduce it again.

24 MR. WOODWARD: Ms. Delgado, so just to be
25 clear, you're not contending that Mr. Parscale

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 has ever seen this document before; correct?

2 MS. DELGADO: Oh, no. Not at all.

3 MR. WOODWARD: Okay. So you're asking him
4 about a document he's never seen before.

5 MS. DELGADO: Correct.

6 MR. WOODWARD: Okay. Going ahead.

7 BY MS. DELGADO:

8 Q Okay. Brad, I wanted to ask you if this
9 rings a bell, or if you have heard anything related
10 to Trump's reaction to the news that I was pregnant?

11 A Not to Trump directly. I was not -- I was
12 not pertained to that, that I remember.

13 Q When you say "not to Trump directly," what
14 do you mean?

15 A You asked the question if Trump was not
16 happy. I wasn't around Trump at that time.

17 Q Did you hear of any reactions other than
18 Jason Miller's?

19 MR. BLUMETTI: Objection to form.

20 THE WITNESS: Other than Jason Miller's, I
21 don't mean this disrespectfully. I don't
22 exactly understand what you're asking me. If
23 you could just tell me what you're trying to
24 get at.

25

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 BY MS. DELGADO:

2 Q Of course, please by all means, tell me if
3 I'm unclear.

4 When you said "not from Trump
5 directly," did you mean there were others whose
6 reactions you do recall?

7 A I remember the rumors, and I remember
8 people talking about the situation. That's all I
9 remember. But I can't -- there's no way in --
10 absolutely no way in 2016 do I remember at this
11 point who told me.

12 Q Okay. Fair enough.

13 Do you recall visiting the White
14 House in -- in 2018, and Trump mentioning me in a
15 positive or negative manner?

16 A I remember going to the White House a lot
17 in 2018, that was my job. However, I can't -- under
18 oath, I cannot recall exactly if Trump ever said
19 anything positive or negative about you. I can't
20 remember the moment. I don't -- I don't remember
21 now.

22 Q Do you recall a conversation you and I had
23 where you told me Trump was urging that I be put on
24 TV because I'm, quote unquote, great on the Russia
25 issue?

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 MR. BLUMETTI: Objection. Hearsay.

2 Objection. Form.

3 MS. DELGADO: It's hearsay. It's a
4 conversation with him.

5 THE WITNESS: I -- when you say that -- I
6 don't really remember, but I don't know. I
7 don't -- I don't remember. I do -- let me
8 rephrase that.

9 I do remember you being positive on
10 Russia, but I can't under oath say who exactly
11 in the room told me you were great on Russia.
12 And you're asking me under oath exactly what
13 someone said, and I don't remember.

14 BY MS. DELGADO:

15 Q Could it have been Trump who said it?

16 MR. WOODWARD: Objection.

17 BY MS. DELGADO:

18 Q You can answer.

19 A Yeah. Of course, it could have been.

20 Q Okay.

21 Brad, is there any reason or -- or
22 animus or personal issue you might have towards me
23 for any reason that would prevent you from giving
24 honest answers here today?

25 MR. WOODWARD: Objection. Compound

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 question.

2 MS. DELGADO: I'll break it up.

3 BY MS. DELGADO:

4 Q Brad, is there any personal animus towards
5 me regarding any issue that would prevent you from
6 giving honest answers here today?

7 MR. WOODWARD: Objection. Compound
8 question.

9 BY MS. DELGADO:

10 Q You can answer.

11 A No. But I'm also under oath, and you're
12 telling, me -- asking me about very specific moments
13 that I don't remember, compared to sitting at a bar
14 having a drink and me trying to remember things.
15 Those are two different things in my book.

16 And if you want me to specifically
17 remember exactly who said something under oath, I
18 don't remember.

19 Q Do you recall telling me that Trump was
20 encouraging that I be placed on TV to defend him
21 during the Russia probe?

22 MR. BLUMETTI: Objection. Hearsay.

23 THE WITNESS: I -- I don't remember. I
24 don't -- AJ, I don't remember.

25 MR. WOODWARD: Let's take a break,

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 Ms. Delgado.

2 MS. DELGADO: Sure. How many minutes
3 would you like?

4 MR. WOODWARD: Less than five.

5 MS. DELGADO: Okay. Because we're on the
6 12:30 time limit for today. So let's try to
7 keep it to five.

8 (Recess.)

9 BY MS. DELGADO:

10 Q All right. I'm going to -- just -- Brad,
11 did you speak with your attorney about your
12 testimony during the break?

13 A No. We spoke about the 2008 KU Basketball
14 game.

15 Q You don't need to tell me what you spoke
16 about, just as long as it wasn't about the
17 testimony. Thank you.

18 A We were both at the same game, we geeked
19 out about it.

20 Q Nice. Nice.

21 So I'm going to show on the screen
22 the --

23 A I cannot ...

24 Q Brad, I think we lost you. Your visual.
25 Your -- I think your camera is off.

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 MR. WOODWARD: We're looking at the
2 document, Ms. Delgado.

3 THE WITNESS: I can't -- my eyeballs
4 cannot see that. I don't know. It's too
5 small. If you can like zoom in or something on
6 whatever you want me to see.

7 BY MS. DELGADO:

8 Q Oh, sure. Let me try zooming in.

9 How's that?

10 A One more if you don't mind.

11 Q Sure. How's that?

12 A There we go. Okay.

13 Q Okay. Now this is -- I'm going to mark
14 this Exhibit 5, I think we're at. This is a
15 privilege log that was produced by Eric Trump in his
16 deposition.

17 (Exhibit 5 was marked for
18 identification)

19 BY MS. DELGADO:

20 Q It was marked as an exhibit in that one,
21 as well. I don't have -- I believe it was. In any
22 event, I wanted to draw your attention, Brad, to --
23 let me scroll up. I'm going to scroll up to the
24 very beginning.

25 And then -- is Giles Parscale; was

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 that your company, Brad?

2 A Yes, ma'am.

3 Q Okay. And who's Lara at Giles Parscale?

4 I'm sorry.

5 A That was Lara Trump.

6 Q Okay. So you had given Eric Trump's wife
7 a job at your company; correct?

8 MR. WOODWARD: Objection to the form.

9 MS. DELGADO: I'll rephrase it.

10 BY MS. DELGADO:

11 Q Had you hired Lara Trump for your company,
12 Giles Parscale?

13 A Yes, I did.

14 Q Okay. I want to scroll up to the top.
15 I'm sorry, at the top.

16 And as you can see here, your
17 employee, Lara, is on this privilege log numerous
18 times listed as having communications about, quote,
19 Delgado with attorneys for the Trump campaign.

20 Do you see that?

21 A Yes. I've never seen one of these before
22 but I'll take your -- yes.

23 Q Do you know why your employee was having
24 communications about me in August 2017?

25 A My company would have been providing

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 services to the Trump campaign. It would not have
2 been unusual for a Trump or a Giles Parscale
3 employee to do something in reference to the Trump
4 campaign, including myself.

5 Q But do you know why your employee would
6 have been having communications with Trump or Trump
7 campaign attorney --

8 A No --

9 Q -- about me?

10 A -- no.

11 Q Is Lara an attorney?

12 A I don't -- I don't think so.

13 Q I want to show you another example here.
14 There's an e-mail from Lara Trump dated August 22,
15 2017. The subject line is Delgado and it's an
16 attorney/client communication.

17 So your --

18 A Okay.

19 Q So your position is you do not know why
20 your employee was communicating with an attorney
21 about me; is that correct?

22 A No, ma'am.

23 Q Okay. And I'm flipping through. As you
24 can see it comes up numerous times.

25 MS. DELGADO: Okay. That's has been

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 marked.

2 BY MS. DELGADO:

3 Q Did Eric Trump tell you to give Lara a job
4 with your company or suggest that you do so?

5 A No. I actually hired Lara because I
6 wanted her to help me to find new business in New
7 York City, which she did.

8 Q Great.

9 Brad, you mentioned the war room
10 earlier; do you remember that?

11 A The big room? I think that was the big
12 room.

13 Q Right.

14 Would you say most of the -- the
15 managers and senior level individuals were often
16 found in the war room?

17 MR. WOODWARD: Objection to form.

18 MR. BLUMETTI: Objection the form.

19 Thank you, Jared.

20 THE WITNESS: I -- yeah, I mean, I think
21 whatever was at that -- I can't remember if
22 that was the 14th or 15th floor. They
23 would have been all over, yeah.

24 BY MS. DELGADO:

25 Q So think back to that war room, just you

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 have a visual, what names can you recall of
2 individuals from that 2016 effort who wanted a White
3 House job but didn't get one?

4 MR. WOODWARD: Objection --

5 MR. BLUMETTI: Object to the form.

6 MR. WOODWARD: -- to the form.

7 Thank you, Jared. Sorry.

8 THE WITNESS: There was several.

9 BY MS. DELGADO:

10 Q I'll rephrase since they're -- I'll
11 indulge the objection.

12 What individuals can you recall from
13 the national level at the 2016 campaign who wanted a
14 White House job but did not receive one?

15 MR. BLUMETTI: Same objection.

16 THE WITNESS: I -- I can't speak for what
17 people what. I mean, that's impossible, AJ.

18 BY MS. DELGADO:

19 Q Okay. You can answer however you see fit.

20 A I can only tell you -- you said before
21 names I remember. I remember there was Brian,
22 right, didn't get one.

23 Q I'm sorry, who? I'm --

24 A The guy's office next to Jason Miller,
25 Brian or whatever his name was. I think it was

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 Brian, right, the surrogate manager.

2 MS. DELGADO: Brian Lanza --

3 (Simultaneous speakers)

4 THE WITNESS: Yeah, that guy.

5 BY MS. DELGADO:

6 Q Okay.

7 A And then Jason, you, me. I didn't want
8 one though. Steve Bannon. Well, no, he got one.
9 The girl that was in my office, I don't remember her
10 name. She wanted a White House job, she didn't get
11 it. Sarah was her name. And then -- and other
12 people around. I can -- I can keep naming them.
13 Garrot Lansing. There's a bunch of people that
14 didn't get White House jobs that wanted them for
15 different reasons.

16 Q Okay. Let's go through the ones you
17 mentioned.

18 Can you recall any others?

19 A I mean, I'd have to sit here all day.
20 I -- that's the ones that come off the top of my
21 head.

22 Q Okay. You mentioned Brian Lanza, the
23 surrogate manager; correct?

24 A Yeah.

25 Q Were you aware Brian Lanza had a criminal

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 drug charge in his background?

2 A Yes, I think I learned that later.

3 Q Okay. And you mentioned Jason Miller.

4 But Jason Miller was announced for a White House
5 job, was he not?

6 A I -- I don't remember, AJ.

7 Q Okay. And the Sarah, quote, from your
8 office. Can you provide some more detail on that?

9 A She worked for Cambridge Analytica.

10 Q So not for the campaign?

11 A Well, that depends on -- I never
12 officially worked for campaign. I mean, I was a
13 vendor of the campaign. So it depends on how you --
14 you view "work."

15 Q Well, you have a contract with the
16 campaign?

17 A Well, Cambridge Analytica had a contract
18 with the campaign.

19 Q The individual has a contract with the
20 campaign. Did --

21 (Simultaneous speakers)

22 THE WITNESS: I did not have -- I did not
23 have an individual contract with the campaign.

24 BY MS. DELGADO:

25 Q Do you recall her last name?

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 A I -- I don't remember if that's her first
2 name. I just remember she sat in my office. That
3 was a long time ago.

4 Q What did she do?

5 A Huh?

6 (Simultaneous speakers)

7 BY MS. DELGADO:

8 Q What did she do? What was her job
9 description, if your recall?

10 A She works in the -- she worked in the data
11 department.

12 Q In the data department?

13 A Uh-huh.

14 Q Okay.

15 Who is Garrett Lansing?

16 A He worked at the Iron Seat.

17 Q So not at the campaign?

18 A No, no. I just -- you said you wanted me
19 to name people who were in the war room. You didn't
20 say -- you didn't ask me for people who worked for
21 the campaign. So I just want to clarify, you said
22 people who were top-level people around the war
23 room.

24 So that RNC was actually based inside
25 the war room, as well. So I'm asking your question

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 specifically the way you asked to try to -- that's
2 what you asked me.

3 Q Fair enough.

4 So if you limit it to individuals in
5 the campaign, we wouldn't include Sarah or Garrett,
6 but you would include Brian Lanza; correct?

7 A Yes.

8 Q And Jason Miller and myself?

9 A David Bossie.

10 Q Okay.

11 Brad, you ran the -- I'm sorry, one
12 more. Katrina Pearson also did not go in to the
13 White House --

14 A Oh --

15 (Simultaneous Speakers)

16 BY MS. DELGADO:

17 Q -- but she was offered a White House
18 position, was she not?

19 MR. BLUMETTI: Objection to form.

20 THE WITNESS: I believe so.

21 BY MS. DELGADO:

22 Q Okay.

23 A Yes.

24 Q Yes. Okay. Thank you.

25 You ran the 2020 campaign for some

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 time; correct?

2 A Yes.

3 Q What complaints of discrimination or
4 harassment were there that you recall?

5 MR. WOODWARD: I'm sorry, Ms. Delgado,
6 could you clarify a time period?

7 MS. DELGADO: During the time he was
8 running the 2020 campaign. So that would be --
9 he would know better than I.

10 MR. WOODWARD: The 2020 campaign?

11 MS. DELGADO: Yes, the 2020 campaign
12 circle. Mr. Parscale, your client, was the
13 campaign manager for a period of time.

14 MR. WOODWARD: I'm going to object to
15 questions about the 2020 campaign.

16 MS. DELGADO: You can object. He still
17 has to answer.

18 MR. BLUMETTI: Object to the form.

19 I'm sorry. Go ahead.

20 BY MS. DELGADO:

21 Q You can answer.

22 MR. WOODWARD: No, I think -- no, I think
23 I'm going to direct him not to answer any
24 questions about the 2020 campaign.
25

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 MS. DELGADO: Okay. Clearly, that's not
2 remotely priveleged. So I'm going to conclude
3 the deposition and go to the judge because at
4 this point, you're obstructing the deposition.
5 There is no ground to -- to tell your client
6 not to answer when you're not remotely
7 asserting a privilege.

8 This is absurd at this point.

9 MR. WOODWARD: The only reason to ask him
10 about the 2020 campaign is because you want to
11 harass him, and you're not allowed to do that.

12 So if you want to educate me on why the
13 2020 campaign is relevant to the 2016 campaign,
14 I may simply have overlooked something but --

15 (Simultaneous speakers)

16 MS. DELGADO: Excuse me. Your -- did you
17 just say that I'm asking him about
18 discrimination and harassment complaints
19 because I want to harass Brad?

20 MR. WOODWARD: That's not what I said, no.

21 MS. DELGADO: Yes. Can the court reporter
22 read back what you just said.

23 (Requested portion read back)

24 MS. DELGADO: I believe I heard the only
25 reason you want to ask him about the 2020

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 campaign was because you want to harass him.

2 You said he's going to say that.

3 Let's go to the -- roll the tape, please.

4 (Simultaneous speakers)

5 MR. WOODWARD: I don't think it works that
6 way. Why don't we go off the record, and we
7 can talk about this.

8 MS. DELGADO: It does. It does.

9 Can the court reporter read back?

10 (Requested portion read back)

11 MS. DELGADO: So Mr. Woodward, you did say
12 what you just said you didn't say.

13 MR. WOODWARD: I will renew my invitation,
14 Ms. Delgado. I don't understand any relevance
15 between the 2020 campaign and the 2016
16 campaign. And so there's no reason in my mind
17 for you to ask him about the 2020 campaign
18 unless you're trying to harass him.

19 MS. DELGADO: He still has to answer. I
20 really --

21 (Simultaneous speakers)

22 MS. DELGADO: -- it's really irrelevant
23 what you think is relevant or not.

24 MR. WOODWARD: Okay.

25 Do you have any other questions that

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 have -- that are not related to the 2020
2 campaign?

3 MS. DELGADO: Is your client going to
4 answer the question, or are we going to
5 conclude this deposition temporarily and go to
6 the judge because you're being obstructionist
7 throughout. And this has reached the pinnacle
8 of it, starting with asking me the night before
9 to send you the exhibits I was going to use in
10 advance, which is already disturbing.

11 But now, you're instructing your client to
12 not answer a question that is not remotely nor
13 even asserting that it's remotely privileged,
14 which is the only basis under which you're
15 allowed to tell your client not to answer.

16 MR. WOODWARD: Do you have any questions
17 that relate to --

18 (Simultaneous speakers)

19 MS. DELGADO: I don't need to move on.
20 Let me be clear, I don't need to move on. This
21 isn't your deposition, it's mine. So stop
22 telling me to move on.

23 Is your client going to answer?

24 MR. WOODWARD: We'll have to talk about
25 it, Ms. Delgado. I mean certainly the 2020

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 campaign --

2 (Simultaneous speakers)

3 MS. DELGADO: No. You're not allowed to
4 talk about it. It's not discussing whether
5 something he's about to disclose or divulge is
6 privileged. So I don't see why you'd talk to
7 your client about that.

8 MR. WOODWARD: The reason I need to speak
9 to my client, Ms. Delgado, is because given
10 that the 2020 campaign is not remotely relevant
11 to the allegations in your lawsuit, we're not
12 prepared to come here today and talk about the
13 2020 campaign. And so I'd have to talk to him
14 about whether we're comfortable proceeding
15 before we can proceed.

16 And I'm asking for your help in
17 understanding why the 2020 campaign is relevant
18 to the 2016 campaign, otherwise my fear is that
19 you're trying to get into topics that would
20 harass him as a witness and not relate to the
21 2016 campaign.

22 MS. DELGADO: That's a lot to unpack,
23 Mr. Woodward. Your definition of what is or
24 isn't relevant to my lawsuit, which you are not
25 familiar with, nor is your opinion relevant as

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 someone who's not in it, nor is counsel to a
2 party in it, is not remotely of interest or
3 relevant or controlling here.

4 So that's your opinion.

5 MR. WOODWARD: Why don't I talk to him and
6 then we'll be back here, give us another --

7 MS. DELGADO: No, I don't agree -- I don't
8 agree to pause yet again for a break so you can
9 talk about whether he's comfortable in a -- in
10 answering something.

11 I posed a question. We're mid question
12 and answer. He needs to answer and I'm not
13 stopping for a break mid question and answer.

14 The question is out there --

15 (Simultaneous speakers)

16 MS. DELGADO: -- and you've directed your
17 client improperly so not to answer. I don't
18 see how -- frankly, I find it highly -- highly
19 insulting when I've come here in good faith for
20 you to say that the reason I'm asking about
21 discrimination or harassment complaints may,
22 during the time that he was campaign manager,
23 which he would have knowledge of as campaign
24 manager, is meant to harass him. That does not
25 even make logical sense, your position on that.

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 So again, for the last time, are you going
2 to continue to tell your client not to answer?

3 MR. WOODWARD: I'm going to speak to my
4 client about that. We'll be back in five
5 minutes.

6 MS. DELGADO: We're mid answer. If you do
7 that, you're taking this deposition off the
8 rails. I've asked a question, you can't stop
9 for a break in the middle of it. And you know
10 that.

11 MR. WOODWARD: I'm going to talk to my
12 client.

13 We're already off the record; correct?

14 MS. DELGADO: We're not off the record.
15 Mr. Woodward, you keep acting as though you are
16 running this deposition. And I realize I'm a
17 woman. I realize maybe my accent doesn't make
18 you take me seriously or the fact that I'm pro
19 se, so please treat me with some respect. As I
20 treat you and I treat Mr. Blumetti and Brad.

21 Now, you're telling the court reporter
22 when to go on and off the record. We are still
23 on the record, sir.

24 MR. WOODWARD: We're going to take a
25 break.

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 MS. DELGADO: We are not going to take a
2 break. We already took a break. You obviously
3 don't need it as a bathroom break or a water
4 break, we just took one.

5 Your client needs to answer the question.
6 And there -- and there he goes.

7 I'm going to have to go to the judge on
8 this. This is deposition has clearly been
9 turned into a -- a ridiculous show.

10 MR. WOODWARD: Could you repeat the
11 question?

12 MS. DELGADO: I want the record to show
13 that Mr. Woodward took his screen on -- put his
14 screen on dark, muted himself and took a break
15 and appears to have spoken to his client in
16 between a question posed and an answer. And
17 now has placed his himself screen back on
18 visual mode, unmuted himself and has asked me
19 to repeat the question.

20 I've never seen a lack of ethics like
21 this.

22 I'll repeat the question. I'm glad this
23 is all on the record.

24 BY MS. DELGADO:

25 Q Brad, what were the discrimination or

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 harassment complaints that you are aware of during
2 the 2020 campaign cycle?

3 MR. WOODWARD: Object to the form.

4 MR. BLUMETTI: Object to the form.

5 THE WITNESS: I don't -- I would not be
6 aware of any of those. That wasn't something
7 that I oversaw.

8 BY MS. DELGADO:

9 Q Did you hear of any?

10 A From 2020 or 2016?

11 Q From the time you were campaign manager,
12 which I believe was the 2020 campaign cycle?

13 A But that's not what you asked me. Was I
14 familiar with any lawsuits about anyone any time or
15 only lawsuits against the 2020 campaign?

16 Q No. Brad, we can break this up if you'd
17 like.

18 During your time as campaign manager
19 for the 2020 election cycle, do you recall any
20 complaints made about anyone in the campaign
21 regarding discrimination or the harassment?

22 MR. WOODWARD: Objection.

23 THE WITNESS: Which campaign? 2016 and
24 2020 are different campaigns, different
25 organizations, different companies.

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 Which one?

2 BY MS. DELGADO:

3 Q Actually, they're not different
4 organizations, and the 30(b)6 witness already
5 testified to that.

6 (Simultaneous speakers)

7 BY MS. DELGADO:

8 Q But you're free to break up the campaign
9 cycle even by year. However you'd like to answer.

10 A I was not aware of any against 2020, but I
11 was aware of others in 2016.

12 Q Okay. So you're not aware in the 2020
13 campaign cycle of any person complaining of
14 discrimination or harassment?

15 A Not that I recall --

16 (Simultaneous Speakers)

17 BY MS. DELGADO:

18 Q Whether they filed a lawsuit or not, I'm
19 just talking about complaints.

20 A I don't recall.

21 Q Who was the HR director when you were
22 campaign manager?

23 A HR director. I mean, I don't remember who
24 had that title. I don't remember who had that
25 title. I can't recall who had the tile.

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 Q Does Megan Powers ring a bell?

2 A She was director of operations.

3 Q Was she ever HR director?

4 A I don't believe so but I don't -- I don't
5 recall.

6 Q When did you stop being campaign manager?

7 A I don't remember exact day, July 2020.

8 Somewhere summer 2020. Maybe June. I don't
9 remember --

10 Q But how many -- go ahead.

11 A I don't remember.

12 (Simultaneous speakers)

13 BY MS. DELGADO:

14 Q How many --

15 A I couldn't tell you the exact day.

16 Q Sorry, the delay. I heard you. Okay.

17 How many months ballpark were you
18 campaign manager for that election cycle?

19 A The only thing I tell people is, this
20 might be inaccurate or not under oath, but I always
21 say it's 897 days. Someone told me that once, so
22 that's what I say.

23 Q Okay. Okay.

24 Who made the decision to hire Jason
25 Miller in the summer of 2020?

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 A Who made the decision? Essentially me.

2 Q Why do you say "essentially"?

3 A I wasn't my idea.

4 Q Whose idea was it?

5 A I could only -- I couldn't tell you
6 exactly who it was.

7 Q Wasn't it Jared?

8 A Jared was part of the process, yes. I
9 couldn't tell you if it's his idea. You asked me
10 whose idea it was. I couldn't tell you if it was
11 his idea.

12 Q Well, you said it wasn't my idea. Right.
13 So are you --

14 (Simultaneous speakers)

15 BY MS. DELGADO:

16 Q So are you indicating that someone told
17 you to hire him?

18 A Yes. I don't recall who that was.

19 Q Okay. That's the person I was asking, who
20 that was.

21 Do you recall telling me that it was
22 Jared?

23 MR. WOODWARD: Object to the form.

24 THE WITNESS: I don't remember AJ, but --
25 I don't remember.

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 BY MS. DELGADO:

2 Q Okay. We will circle back to that.

3 Brad, do you recall in summer of
4 2019, being told that I needed a job with the
5 campaign?

6 A You needed a job?

7 Q Or wanted a job, was seeking a job.

8 A Yes.

9 Q Who told you that?

10 A I -- I need to think. I believe Katrina
11 Pearson.

12 Q Do you recall what she said?

13 A I don't recall what the exact words were
14 anymore.

15 Q Fair enough.

16 But it was conveyed to you that I was
17 interested in -- in being rehired by the campaign;
18 correct?

19 A Yes.

20 Q Okay. And was that job give to me?

21 A No.

22 Q Why not?

23 MR. WOODWARD: Object to the form.

24 THE WITNESS: Could you ask me something
25 more specific? Do you just want me to

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 diatribe? I don't know what I'm supposed to
2 say here, like.

3 Do I remember why not? A litany of
4 things. I think mostly I believe you were
5 suing the campaign. By what I was being told
6 you were suring the campaign. I think -- I
7 believe that people told me that you were
8 railing on the president on-line. And that you
9 had so-called flipped, is the term people use,
10 on the president?

11 I think those were the main ones I
12 remember.

13 (Simultaneous speakers)

14 BY MS. DELGADO:

15 Q Had you seen --

16 A Huh?

17 Q Had you seen any such evidence yourself?

18 A I can't recall if someone showed me
19 something or not.

20 Q Are you aware of the campaign in 2016 or
21 2020 cycle ever hiring individuals who had
22 previously been critical of the President?

23 MR. WOODWARD: Object to the form.

24 THE WITNESS: Of course.

25

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 BY MS. DELGADO:

2 Q And even --

3 (Simultaneous speakers)

4 BY MS. DELGADO:

5 Q Go ahead.

6 A Kellyanne Conway.

7 Q Right. Correct.

8 Would Jason Miller be another
9 example?

10 A I did not know Jason or know who Jason
11 was.

12 Q Do you recall Jason Miller spending close
13 to a year calling Donald Trump sleezy Donald during
14 the 2016 election?

15 A I had no idea who Jason was before he
16 shows up at the campaign?

17 Q Sure. Fair. Okay.

18 So I want to show you -- Brad, would
19 you have hired me for the 2019 -- when Katrina
20 approached you, did -- did you have an inclination
21 to hire me?

22 MR. WOODWARD: Object to the form.

23 THE WITNESS: I think whatever's laid in
24 front of me, it was not -- you're asking me if
25 I would have if the things put in front of my

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 were not there, or are you telling me would I
2 have hired you on this -- if I would have -- if
3 I could have hired you -- how I do say this?

4 MR. WOODWARD: Why don't you restate the
5 question, Ms. Delgado?

6 THE WITNESS: Yeah.

7 MS. DELGADO: I've stated it. He was mid
8 answer.

9 THE WITNESS: Well, I'm having a hard time
10 answering it because I'm not exactly sure what
11 you're asking me. Because --

12 BY MS. DELGADO:

13 Q Would you have hired me -- would you have
14 hired me but for what was put in front of you?

15 A If it wasn't put in front of me?

16 Q Right.

17 A Yes.

18 Q Okay. Fair enough.

19 MS. DELGADO: I'm introducing another
20 exhibit, which I believe we're up to Number 6.

21 (Exhibit 6 was marked for
22 identification)

23 MS. DELGADO: And this was produced,
24 Mr. Blumetti, in production, I know that. It
25 didn't have a Bates stamp copy, but I think

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 it's somewhere the 700 number.

2 MR. BLUMETTI: Ms. Delgado, you previously
3 designated these documents as confidential.
4 Are you waiving that designation?

5 MS. DELGADO: I don't know what this one
6 was. Like I said, I don't have the Bates stamp
7 copy. But as for this --

8 (Simultaneous speakers)

9 MR. BLUMETTI: The entirety of the
10 production was marked confidential. So --

11 MS. DELGADO: I'm not --

12 (Simultaneous speakers)

13 MR. BLUMETTI: -- if this was included in
14 the production then it necessarily was. So I'm
15 just asking, are you waiving confidentiality?

16 MS. DELGADO: For this particular document
17 I see no reason to keep -- continue it labeled
18 as confidential. I'm of course not waiving
19 confidential designation on the rest of the
20 documents.

21 Are we clear on that?

22 MR. BLUMETTI: Yeah, but just to the
23 extent that you're going to show him a document
24 that you're not waiving, he's going to need to
25 sign off on a protective order.

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 MS. DELGADO: Okay. We can do that. But
2 I -- this one I'm not keeping the
3 confidentiality designation on it. I see no
4 reason to.

5 So I see no reason to bother him with the
6 confidentiality order.

7 BY MS. DELGADO:

8 Q Okay.

9 Brad, is -- this is a message string.
10 Did you have a chance to read it? I'll pause while
11 you do so.

12 MR. WOODWARD: We're reviewing.

13 THE WITNESS: Who's who? Who's who?

14 MS. DELGADO: Brad, you're in gray.

15 THE WITNESS: Okay. Sorry. I could
16 not -- I don't remember this. I don't know
17 who's who.

18 BY MS. DELGADO:

19 Q Sure.

20 A Okay.

21 Q Okay. Does that help refresh your
22 recollection at all as to who it was you stated --

23 A I don't know who -- I don't remember who
24 Rodger Sollenberger is.

25 Q Sure. Sure. I won't ask you about that.

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 A Oh.

2 Q Where I mentioned Eric and Jared, does
3 that help refresh your recollection as to who told
4 you not to bring me on board?

5 MR. WOODWARD: Object to the form.

6 I'm sorry, Ms. Delgado, the blue is you
7 texting? That's you writing?

8 MS. DELGADO: Yes.

9 MR. WOODWARD: Your question is: Does you
10 telling Mr. Parscale something refresh his
11 recollection?

12 MS. DELGADO: Yes. It's -- at the time
13 I'm recapping a conversation Mr. Parscale and I
14 had just had on the phone.

15 MR. WOODWARD: I'm going to object to the
16 form.

17 THE WITNESS: (reading sotto voce).

18 Okay. So what are you asking me?

19 BY MS. DELGADO:

20 Q Does my reference -- notwithstanding that
21 you say once it's reduced to writing, suddenly that
22 you don't remember all of it, does my reference to
23 Eric and Jared help jog your memory as to who told
24 you not to bring me on?

25 MR. WOODWARD: Object to the form.

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 MR. BLUMETTI: Objection to relevance.

2 THE WITNESS: Wait, I -- this doesn't talk
3 about not bringing you on. This talks about
4 hiring Miller.

5 Where does it say about not bringing you
6 back on?

7 BY MS. DELGADO:

8 Q Where it says, "and my job inquiry last
9 year."

10 A Oh. Okay. (reading sotto voce).

11 I -- again, I don't remember exactly.
12 And to what I might have said on a phone call one
13 time, I don't remember saying that either. I --
14 it -- there's a thing of -- off the cuff, I don't
15 remember who has exactly told me not to hire you.

16 I don't remember exactly who came up
17 with the idea to hire Jason Miller. I don't
18 remember him. A lot of those things happen in the
19 White House. I don't know.

20 Q Who had greater control over who was hired
21 than the campaign manager; who would have been above
22 you?

23 A Donald Trump, Jared Kushner would have
24 been the main two.

25 Q So would you agree that it would have had

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 to have been one of those two individuals who --

2 MR. BLUMETTI: Objection to form.

3 THE WITNESS: No. The reason why is under
4 this conception that when I hired Jason Miller,
5 my relationship with Donald Trump was
6 struggling from a conversational style. And I
7 was asking multiple people throughout the White
8 House and through the network to --

9 (Simultaneous speakers)

10 BY MS. DELGADO:

11 Q Sorry, I just don't want to --

12 (Simultaneous speakers)

13 BY MS. DELGADO:

14 Q I'm sorry, I just don't want to have to
15 strike this as nonresponsive.

16 (Simultaneous speakers)

17 BY MS. DELGADO:

18 Q I just wanted to clear. The question
19 wasn't about your hiring Jason. It was about me.

20 A Okay. Sorry. I thought you asked me
21 about hiring Jason.

22 Q No, it's okay.

23 Just who would have been above you.
24 You stated earlier that you would have been
25 instructed not to hire me, litigation being one of

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 the reasons.

2 What -- who would have been above
3 you? You said it would have been Mr. Trump?

4 A Yeah. That -- there would have been a lot
5 of people could say for me not to hire you. It
6 could have been lawyers. I could have been family
7 members. I could have been my, kind of, cabinet,
8 you know, suggesting that I don't. Inevitably, it
9 was my choice not to hire you. I could have -- I
10 could have gone over all of them at risk of my
11 own -- my own job.

12 Q Did you just say it was your choice?

13 A I'm saying inevitably, it was my choice
14 who to hire and not to hire.

15 Q Okay.

16 Who would have influenced that
17 decision?

18 MR. BLUMETTI: Objection to form.

19 THE WITNESS: Anyone and everyone. My
20 job -- my job was a difficult one of choosing
21 what was best for the campaign and how not to
22 get Donald Trump pissed off at me every day.

23 BY MS. DELGADO:

24 Q Okay.

25 MS. DELGADO: Okay. I'm going to mark

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 this Exhibit 7.

2 (Exhibit 7 was marked for
3 identification)

4 BY MS. DELGADO:

5 Q Brad, this is a single message between us
6 that I found that I had screen shot from 2022. I'll
7 give you a second to read it over.

8 Now do you see it?

9 MR. BLUMETTI: Ms. Delgado, this document
10 was previously designated as you as
11 confidential. Are you waiving confidentiality
12 as to this document?

13 MS. DELGADO: As to this document, sure.

14 BY MS. DELGADO:

15 Q Brad, when you've had a chance to read it
16 over, this is Exhibit 7. I'm marking this Exhibit
17 that is. Let me know, please.

18 MR. WOODWARD: We're reviewing, Ms.
19 Delgado.

20 MS. DELGADO: Okay.

21 (Simultaneous speakers)

22 BY MS. DELGADO:

23 Q Is there a reason you -- you went dark
24 during that?

25 MR. WOODWARD: Yes. I don't want you to

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 see my nose hairs when I lean in to look at the
2 document.

3 How do we know what year the -- the text
4 is from?

5 MS. DELGADO: I'm sorry. You said you
6 didn't want me to see what?

7 MR. WOODWARD: I'm leaning into the screen
8 so I don't want you -- I don't want to zoom in
9 on my face.

10 Is there -- how do we know --

11 (Simultaneous speakers)

12 MS. DELGADO: Hang on one second, Mr.
13 Woodward. I don't think you're allowed to
14 darken or take off your video just as if we
15 were in person, I'd still be able to see you
16 face while you're reading something. You also
17 went on mute.

18 MR. WOODWARD: I don't even know what --

19 (Simultaneous speakers)

20 MS. DELGADO: I want the record to
21 reflect that they were not visible or audible
22 for --

23 (Simultaneous Speakers)

24 MR. WOODWARD: Let me know when you're
25 finished.

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 MS. DELGADO: Did you speak to your client
2 while your camera was dark?

3 MR. WOODWARD: How do we know what year
4 the document is from?

5 MS. DELGADO: Mr. Woodward, did you speak
6 to your client while the camera was dark?

7 MR. WOODWARD: I'm not being deposed, Ms.
8 Delgado.

9 MS. DELGADO: Your client is, and you're
10 not supposed to speak to him. And I believe
11 you just did and that's why you darkened your
12 camera.

13 MR. WOODWARD: You could ask him that.

14 Can you -- how do we --

15 (Simultaneous speakers)

16 BY MS. DELGADO:

17 Q Brad, did your attorney speak with you or
18 pass you a note?

19 A No, he actually didn't. I was just making
20 an expression of you saving my text messages.

21 Q You were -- I'm sorry, what?

22 A I was making an expression -- nothing.

23 Q I'm sorry, what did you say? You cut out.

24 A Just disappointed of you saving our text
25 messages.

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 Q As disappointing as when someone lies
2 under oath, I could tell you that.

3 MS. DELGADO: Mr. Woodward, what was your
4 question?

5 MR. WOODWARD: How do we know what year
6 this is from?

7 MS. DELGADO: This is from 2022.

8 MR. WOODWARD: How do we know that?

9 (Simultaneous speakers)

10 MR. WOODWARD: Okay.

11 BY MS. DELGADO:

12 Q Okay. So Brad, does this message help
13 refresh your memory.

14 A Memory of what?

15 Q As to why you did not hire me?

16 A I already told you why, yes. I said it's
17 because you were suing the campaign and people said
18 you flipped. And so I made the decision it wasn't
19 worth it.

20 Q I just want -- where does it say there
21 that I flipped?

22 A It doesn't. This one says suing. But
23 that doesn't mean there wasn't other issues.

24 Q You also said earlier that it was your
25 decision. But it says here, does it not, quote, I

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 was told I couldn't by the family, unquote?

2 A I don't recall who told me, but that would
3 have been possibly one of the reasons I didn't do
4 it.

5 Q Does that family include Eric or just
6 Jared?

7 A I couldn't tell you at that point who --
8 who it was.

9 Q And I'm want to also show you -- I can
10 show you this one on the chat. Let's see if I can
11 make that work. I'll speed things up.

12 Do you recall a Tweet of yours, Brad,
13 I could show it on the rake screen, I'm just trying
14 to speed things up, where you said that Jared and
15 Eric made all the decisions for the campaign?

16 A Yeah. I did say that in 2016.

17 Q Okay. Then I want to show you another
18 exhibit. I'm going to turn this one off. I
19 apologize for my tech -- lack of tech savviness.
20 Bear with me one second please.

21 Okay.

22 MS. DELGADO: Okay. I'm marking this, I
23 think we're Exhibit 8. I hope you can see this
24 e-mail.

25 (Exhibit 8 was marked for

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 identification)

2 BY MS. DELGADO:

3 Q This is an e-mail from John Phillips who
4 was the -- my attorney on this case in the summer of
5 2023. And it's relying, Brad, what your attorney
6 Mr. Woodward stated to Mr. Phillips on a call
7 initiated and suggested by Mr. Woodward.

8 I'll give you a chance to reread
9 that. I'll black out anything that's
10 attorney/client privilege or may be.

11 A Okay.

12 Q Your attorney stated that he would -- that
13 you would testify that you were told not to hire me;
14 is that correct?

15 MR. WOODWARD: Objection. Ms. Delgado,
16 are you asking him what the e-mail says or what
17 I told the attorney?

18 MS. DELGADO: Yes. I'm asking what the
19 e-mail says.

20 THE WITNESS: The e-mail says what you
21 just said. Do you want me to read it or -- I
22 don't know what to do here?

23 You said Brad would testify that he was
24 not told -- he -- told not to hire you in 2020
25 and discussed how you were suing and should be

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 disqualified. I said that like three times --

2 BY MS. DELGADO:

3 Q Okay. Do you have any reason to believe
4 this -- what is relayed here is inaccurate?

5 A I mean essentially, no.

6 Q Okay. That's all I needed. This isn't a
7 trick question.

8 Okay. Stop sharing. Let's see.

9 Brad, do you recall why Jason Miller
10 was paid through Jamestown Associates while you were
11 the campaign manager?

12 MR. WOODWARD: Object to the form.

13 THE WITNESS: He has -- he asked to be
14 paid through a vendor.

15 BY MS. DELGADO:

16 Q I'm sorry. Can you repeat -- sorry, the
17 delay.

18 A He asked to be pay through a vendor.

19 Q Why?

20 A Through his own company.

21 Q Why?

22 MR. WOODWARD: Object to the form.

23 THE WITNESS: Essentially, told me he
24 didn't want to be on the payroll -- on the
25 payroll records.

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 BY MS. DELGADO:

2 Q Okay. Did he claim to be a partner at
3 Jamestown?

4 A I don't know if he used that exact words,
5 but he said that he was associated with -- I can't
6 remember if he said partner or not but he said he
7 was associated with Jamestown.

8 Q Were you aware Mr. Miller had completely
9 separated from Jamestown in early 2017?

10 A No, I was not aware of. I was not aware
11 of any of their real details.

12 Q Fair enough. Okay.

13 The campaign did then, in fact, pay
14 Mr. Miller his compensation by paying Jamestown who
15 would than pay Mr. Miller; is that -- am I
16 understanding it correctly?

17 A As I believe that happened after I told
18 the staff to do it that way.

19 Q Do you know if Mr. Miller received any
20 compensation from American Media Consultants?

21 A All that happened after I left.

22 Q Okay. Fair enough.

23 I apologize if I asked you this
24 earlier, but I think the answer was -- fell through
25 the cracks or was caught in crosstalk.

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 Who made the decision to hire Miller
2 in 2020 for the -- I'm sorry -- yeah, in 2020, yes?

3 A The decision to say put him on payroll was
4 me.

5 Q Who suggested hiring Miller in 2020?

6 A I don't remember who, but I was at the
7 White House where people suggested that I should
8 bring him on. I believe it was a collective of
9 people that included top level people at the White
10 House.

11 Q Were you in favor of that hiring?

12 A Yes and no.

13 Q Could you elaborate on that please?

14 A Yes, because I felt that he could solve
15 problems I had. And no because I -- I didn't trust
16 him.

17 Q I'm sorry, the delay. Say that again,
18 please.

19 A Yes, because I thought he would solve some
20 of my problems, but no, because I didn't trust him.

21 Q Why did you not trust him?

22 A I just -- suspicion.

23 Q I'm sorry?

24 A Just -- just a history of suspicion.

25 Q Did you or anyone at the campaign express

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 or have any concern about bringing someone on board
2 who had impregnated a subordinate last time they
3 worked for the campaign?

4 MR. WOODWARD: Objection to form.

5 MR. BLUMETTI: Objection to form.

6 BY MS. DELGADO:

7 Q Okay. Let me phrase it.

8 Are you aware that Mr. Miller
9 impregnated a subordinate in the 2016 election
10 cycle?

11 MR. WOODWARD: Objection to form.

12 THE WITNESS: Of course, yes.

13 MR. BLUMETTI: Objection.

14 BY MS. DELGADO:

15 Q I think we're all aware of that.

16 So come summer 2020, did you express
17 or have, or did anyone else express any concerns --

18 A Yes.

19 Q -- regarding Mr. Miller due to that
20 conduct?

21 A Yes.

22 Q Does that include you?

23 A Yes, I expressed concern.

24 Q So it wasn't just that he's a suspicious
25 person, as you said, but also his actions in 2016;

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 is that correct?

2 MR. WOODWARD: I'm going to object.

3 That's not how -- that mischaracterizes his
4 testimony.

5 BY MS. DELGADO:

6 Q I'm happy to have him clarify. Please do
7 if I'm mischaracterizing, Brad.

8 A Well, you're -- you're mixing two things.
9 So -- you're asking why I thought -- I -- I didn't
10 have a problem with either things most people's
11 mistakes like that. I brought on multiple people
12 that had bad histories because I believe in
13 redemption.

14 However, the difference is other
15 people -- you asked me what my problems were. I
16 said yes because he could help me with a problem I
17 had with handling President Trump. I said no
18 because I was suspicious that he would really have
19 my back or just try and take me out. And I -- and
20 then you asked, you know, about the background
21 stuff.

22 For me, that's never been a thing
23 that -- that makes me choose or not choose people
24 because I believe in redemption.

25 Q Notwithstanding the admirable belief in

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 redemption, you did not have a concern about placing
2 Mr. Miller in a position of authority over women
3 once again?

4 MR. BLUMETTI: Object to the form.

5 THE WITNESS: I mean, that makes me sound
6 bad that way.

7 No, I didn't. I didn't think that anybody
8 would do that dumb of a thing twice.

9 BY MS. DELGADO:

10 Q You're not aware of any complaints against
11 Mr. Miller from any staffer?

12 A No.

13 MR. WOODWARD: Object to the form.

14 MR. BLUMETTI: Objection to relevance.

15 THE WITNESS: As you know that we spent a
16 very small time together. Before COVID came.

17 BY MS. DELGADO:

18 Q Do you recall Jenna Ellis?

19 A I mean, I know who Jenna Ellis is.

20 Q She worked on the 2020 campaign?

21 A Yes, she did.

22 Q Okay. Do you recall -- and we can throw
23 up a headline about it, but do you recall Ms. Ellis
24 informing you and your informing me that Ms. Ellis
25 had been verbally abused in the war room by Mr.

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 Miller?

2 MR. WOODWARD: Object to the form.

3 MR. BLUMETTI: Relevance.

4 THE WITNESS: It would -- you have to show
5 me but I -- I do remember there were problems.

6 I couldn't tell you exactly what it was.

7 BY MS. DELGADO:

8 Q Okay. We'll circle back to that. I'll
9 show you the report I'm referring to. We'll bring
10 that up on screen. I'm just trying to go through
11 without requiring an exhibit first. We'll come back
12 to that one.

13 Brad, you provided a recommendation
14 for me for a job with the Veterans Administration in
15 2022; correct?

16 A Yes. I did an entire interview for you.

17 Q I'm sorry, what?

18 A I did an entire interview at lunch with --
19 for you.

20 Q Yes. Thank you.

21 What did you tell the VA?

22 A That you're a talented individual that
23 could provide good work. I mean, I don't remember
24 everything I said, AJ. I apologize, I can't do it
25 verbatim.

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 Q But you felt comfortable recommending me
2 for a position with the U.S. Government?

3 A I did under oath.

4 Q Okay.

5 Do you recall -- and again, I can
6 throw it up on the screen if you don't, I'm just
7 trying to keep things moving. Do you recall
8 re-tweeting a tweet of mine in 2022, about Jason
9 Miller refusing to pay for a dental fluoride
10 treatment for William, my son?

11 A I don't -- I don't remember the tweet, but
12 I do remember re-tweeting something that really
13 pissed him off.

14 Q Okay. And do you recall the text message
15 you received from Mr. Miller?

16 A Again, I don't remember what it said but
17 it wasn't nice.

18 Q Okay. Let me throw it up on the screen.

19 (Sotto Voce Discussion.)

20 MS. DELGADO: Okay. I'm going to share my
21 screen.

22 BY MS. DELGADO:

23 Q Does this ring a bell? It's still on your
24 page, but does this ring a bell as being a tweet
25 that you re-tweeted? Let me share the screen.

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 It might be easier to put it in the
2 chat.

3 (Exhibit 9 was marked for
4 identification)

5 THE WITNESS: I remember re-tweeting. It
6 doesn't matter --

7 BY MS. DELGADO:

8 Q Okay.

9 A I can't read that but I have to get close.

10 MS. DELGADO: Okay. We'll mark that as --
11 what number are we by, nine? Okay. We'll mark
12 this as Exhibit 9.

13 BY MS. DELGADO:

14 Q And you just stated, Brad, that you
15 remember --

16 A I don't -- I don't think that's the tweet
17 I re-tweeted.

18 Q Wait, no. Not this one. Sorry. No, not
19 this one. Yeah, sorry, I'm not trying to -- it's
20 this one.

21 A Yeah, yeah, that's what I remember.

22 Q Yeah. Okay.

23 So you remember re-tweeting this?

24 A Yes.

25 Q Okay. You didn't add any comment,

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 correct, you simply repeated it?

2 A I believe so, yes.

3 Q Okay. Okay. So stop share. And then I'm
4 going to mark as exhibit -- I think we're in 10.

5 (Exhibit 10 was marked for
6 identification)

7 BY MS. DELGADO:

8 Q So I'm marking this Exhibit 10. This is a
9 text message you sent me a screen shot of that you
10 had received from Jason about a -- less than a
11 minute after you re-tweeted my tweet.

12 A I don't remember how many minutes.

13 MR. WOODWARD: Object to the form.

14 BY MS. DELGADO:

15 Q Okay. I'll rephrase it.

16 Was it shortly thereafter?

17 A Yes, ma'am. Yes, ma'am.

18 Q Would you say it was within minutes?

19 A Yes, ma'am.

20 Q Okay. And it says, "Hey Brad, you want me
21 to fire back? Game on motherfucker."

22 Is that correct?

23 A Yes.

24 Q Did you respond?

25 A No.

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 Q Have you spoken to Jason Miller since
2 then?

3 A No.

4 Q By text?

5 A No.

6 Q Any format?

7 A No.

8 Q Okay.

9 Did he send you any additional
10 threats?

11 MR. WOODWARD: Object to the form.

12 THE WITNESS: I don't think so.

13 BY MS. DELGADO:

14 Q Did he do any additional -- I'll rephrase
15 it.

16 Did he send you any additional
17 communication?

18 A I don't think so.

19 Q Okay. Stop sharing.

20 I want to double check. On
21 Attachment A, your attorney stated you have nothing
22 at all. So I just want to state for the record,
23 your position is that you don't have any
24 communications with any third party about me from
25 2016 to current present day?

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 MR. WOODWARD: That's my position. We can
2 talk about that offline if you'd like, Ms.
3 Delgado.

4 MS. DELGADO: Why is it your position
5 versus his, Mr. Woodward?

6 MR. WOODWARD: Because I have the
7 privilege of being his attorney.

8 MS. DELGADO: That notwithstanding, the
9 deposition notice is served on him, I could ask
10 him if he has anything to produce.

11 BY MS. DELGADO:

12 Q Brad, you don't have any documentation
13 about me with anyone?

14 MR. WOODWARD: Ms. Delgado.

15 BY MS. DELGADO:

16 Q For the last eight years?

17 MR. WOODWARD: Ms. Delgado.

18 MS. DELGADO: Could you not interrupt
19 unless it's a privilege objection or to state
20 one for the record.

21 BY MS. DELGADO:

22 Q Brad, do you have anything?

23 MR. WOODWARD: What -- you can answer
24 that.

25 THE WITNESS: I don't have any of my old

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 e-mails that -- you know, going back that far.

2 I believe the only communications I've talked
3 about you is with you.

4 BY MS. DELGADO:

5 Q So did you delete the tweets with Miller,
6 the text with Miller?

7 A I mean, is that talking about you?

8 Q It's about me.

9 MR. WOODWARD: Objection.

10 THE WITNESS: I think it's about me.

11 Okay.

12 BY MS. DELGADO:

13 Q And text messages or communication or
14 e-mails with anyone regarding this lawsuit, you also
15 have none?

16 A I can't -- I can't answer than sitting
17 right here, but almost all my e-mails post the
18 campaign. So those would be campaign questions I
19 think when I worked in those capacities. I don't
20 believe so, other than communications you would have
21 because they were with you.

22 Q Okay. And the two final categories, I'm
23 going to assume you're also going to say you have
24 none. It's communications with Eric Trump regarding
25 me or with Jason Miller regarding me. Your position

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 is you have nothing?

2 A Erica who?

3 Q With Eric Trump or with Jason Miller.

4 Your position is you have neither? You have nothing
5 to produce on either of those counts?

6 A I've never talked to Jason Miller about
7 you ever. And then -- and then Eric Trump and I
8 have barely talked since the campaign days.

9 Q I'm sorry, with who have you --

10 (Simultaneous speakers)

11 BY MS. DELGADO:

12 Q -- barely talked?

13 A I've barely talked to Eric Trump since the
14 campaign.

15 Q Okay.

16 Are you aware of any -- did any women
17 make any complaints about any men from the 2016 or
18 2020 campaign cycles apart from Jason Miller and
19 myself?

20 MR. WOODWARD: Objection. That's a
21 compound question.

22 Can you rephrase that, please?

23 MR. BLUMETTI: Objection.

24 BY MS. DELGADO:

25 Q Sure. I'll speed it up.

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 From the 2016 election cycle, do you
2 recall any women who made any complaints against any
3 men or about any men?

4 A I'm not an attorney for the campaign, but
5 I -- I do remember there are complaints. I couldn't
6 tell you exactly what's in the complaints.

7 Q I don't mean formal, legal complaints,
8 just anything that you heard about someone
9 complaining or being concerned?

10 A Oh. Yeah, a couple of times. I don't
11 remember exactly what, but, you know, girls have
12 said guys asked them out, things like that. I
13 remember stuff like that a little bit. But I wasn't
14 in charge in '16. I don't remember anything in
15 2020.

16 Q Okay. Do you remember what the complaints
17 were or the women or the men involved in those?

18 A I don't remember. I can't -- maybe. I
19 don't think so. I couldn't tell you who the names
20 were. Maybe Delgado, I think, right, was one. I
21 can't remember what her complaint was. Not Delgado,
22 sorry --

23 Q Denison you're thinking of who has a
24 lawsuit against --

25 A The --

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 (Simultaneous speakers)

2 THE WITNESS: The Bannon one. I don't
3 remember who it was.

4 BY MS. DELGADO:

5 Q Right. Right.

6 Any others?

7 A Not that I remember. I remember the girl
8 that got -- snuck herself on the Trump plane,
9 whatever. That's all I remember. I can't remember
10 her name.

11 Q Right. Okay.

12 Okay. Let me share this.

13 Were there any against you?

14 A No. Not that I know of.

15 (Exhibit 11 was marked for
16 identification)

17 BY MS. DELGADO:

18 Q I'm going to share the screen. We'll mark
19 this as Exhibit 11. This is a conversation I
20 recently had with Jenna Ellis when I was trying to
21 serve you papers to testify in this case.

22 I'll give you a moment to read over
23 it. Let me know when you're done.

24 A I'm done.

25 Q Okay. In it -- I'm sorry I have to bring

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 this up, but in it Ms. Ellis shares that you had
2 drunk texted her inappropriately. What was that --
3 I'm not trying to probe into your personal life, so
4 I'd only restrict this to, was that while you were
5 working together in Trump World or on the campaign?

6 A No.

7 Q No. Okay. I don't need to know if it was
8 in a personal capacity.

9 So the answer, just to be clear, was
10 no, that was not while you were working together?

11 A Yes. Yes. It was not while we were
12 together.

13 Q Okay. Sorry. There's a delay in the --
14 it sounds sometimes a little bit delayed. So okay.
15 Thank you.

16 I will stop sharing.

17 I'm going to mark another e-mail.
18 We're on 12.

19 (Exhibit 12 was marked for
20 identification)

21 BY MS. DELGADO:

22 Q I'm going to share the screen.

23 Okay. Scroll to the top. I've
24 redacted the e-mail addresses but Brad, that is an
25 e-mail string between your personal e-mail and my

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 personal e-mail from July 2023.

2 I'm surprised this wasn't produced
3 because Mr. Woodward had mentioned this e-mail when
4 he spoke to Mr. Phillips. I -- if you'd like I'll
5 start at the bottom so that you can read it
6 chronologically, if that makes sense to everyone.

7 Let me just do via zoom out so we can
8 get some more. Okay. How's that? You can read the
9 first bit and then I'll scroll up so you can read
10 chronologically.

11 Brad, are you still there?

12 A Yeah.

13 MR. WOODWARD: We're here. We're just
14 reading the e-mail.

15 MS. DELGADO: I don't mind seeing your big
16 faces. It's okay. We all do the same.

17 Could you not turn the video off, please.
18 I don't know why --

19 MR. WOODWARD: No thank you.

20 MS. DELGADO: I'm entitled to see you.

21 Let the record show that they, once again,
22 blacked out their camera.

23 MR. WOODWARD: Can you scroll up, please?

24 MS. DELGADO: Are you done reading the
25 first part from AJ Delgado to Bradley Parscale

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 July 7, 2023, 1:59 p.m.?

2 MR. WOODWARD: We are.

3 MS. DELGADO: Okay. So now I'll put
4 Brad's response, 2:21 p.m. same day.

5 MR. WOODWARD: Can you scroll up, please.

6 MS. DELGADO: Yep. The next is from AJ,
7 3:10 p.m. July 7th. I'm starting at the top.

8 THE WITNESS: All right.

9 MS. DELGADO: There's a little more on
10 this page. It continues.

11 MR. WOODWARD: We read the whole thing
12 backwards; right?

13 MS. DELGADO: Did you read the top three
14 paragraphs there?

15 MR. WOODWARD: Yes.

16 MS. DELGADO: Okay. So then -- and then
17 there's another follow up e-mail. And it's
18 from me at 2:27.

19 MR. WOODWARD: Okay.

20 BY MS. DELGADO:

21 Q Okay. Do you know why your attorney,
22 Mr. Woodward, mentions this e-mail to my attorney?

23 A No.

24 Q Do you know he said it was embarrassing
25 for some?

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 A No.

2 Q Okay. I had asked you earlier about
3 misconduct on the campaign by males, although I did
4 ask about women. The incident referenced there to
5 which you were subjected by Eric Trump, according to
6 what I wrote in the e-mail, does the ring a bell?

7 A Does it ring a bell that you've said that,
8 or ring a bell that it's true?

9 Q Do you -- let's go in order.
10 Do you recall receiving this e-mail?

11 A Yes.

12 Q Okay. Do you recall telling me about the
13 incident referenced in that e-mail with Eric Trump?

14 A No, actually I don't.

15 Q You're aware you're under oath; right?

16 A A hundred percent.

17 Q Okay. So your position is that this is
18 completely fabricated?

19 MR. WOODWARD: Objection. That's not what
20 he said.

21 BY MS. DELGADO:

22 Q You just -- you're saying you don't recall
23 telling me?

24 A I don't recall saying it. I don't recall
25 anything happening.

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 Q You don't recall being in a hotel room
2 with Eric Trump where he was having a foursome or
3 encouraging you to take part in a foursome?

4 A Absolutely not.

5 Q You don't recall telling me that in a bar
6 in Atlanta?

7 MR. WOODWARD: Objection. This is -- this
8 is harassment.

9 MS. DELGADO: No, it's not. It has
10 nothing to do with him. He's accused of no
11 wrongdoing or even alleged of any wrongdoing.

12 THE WITNESS: No, I do not.

13 BY MS. DELGADO:

14 Q So why did you not respond to this e-mail
15 stating, "What are you referring to"?

16 MR. WOODWARD: Objection. Privileged.

17 MS. DELGADO: That's privileged?

18 MR. WOODWARD: My advice to him is
19 privileged, yes.

20 BY MS. DELGADO:

21 Q You spoke to an attorney about it?

22 MR. WOODWARD: Objection.

23 BY MS. DELGADO:

24 Q I can ask that?

25 A I don't remember what I did after this if.

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 I didn't respond, I didn't respond, I don't remember
2 why.

3 Q Well, your attorney just said the reasons
4 are privileged. So he's essentially stating that
5 you spoke to legal counsel about it?

6 A Well, maybe he remembers. I don't
7 remember. Maybe I did. I don't remember. It was a
8 year ago.

9 Q Has Eric Trump contacted you about this?

10 A No.

11 (Simultaneous speakers)

12 BY MS. DELGADO:

13 Q Has Eric Trump sued you for defamation?

14 A No.

15 Q Okay. So under oath, your position is
16 that you never stated that this occurred, what is
17 referenced in that e-mail?

18 A I have no recollection of ever saying that
19 while drinking with you at a bar.

20 Q You have no recollection of it; correct?

21 A I don't remember saying this. You were
22 the only one that's ever said that I said this.

23 Q I'm sorry?

24 A You're the only one that's ever said I
25 said this.

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 Q You're a little grainy. You said you're
2 the only one whose ever --

3 A One who's ever said that I've said this.

4 Q Well, am I the only person you told?

5 A I don't remember telling you this. It's
6 not true.

7 Q Would you on concede that perhaps -- okay.

8 And it's not true, you said?

9 A It's absolutely not true.

10 Q Do you know why you would have made
11 something up of that nature?

12 MR. WOODWARD: Objection. Can you
13 rephrase the question?

14 BY MS. DELGADO:

15 Q Would there have been any reason for you
16 to make up a story about Eric Trump?

17 MR. WOODWARD: Again, we're getting --
18 we're very well over the line here.

19 MS. DELGADO: Not at all. It goes to the
20 witness's credibility on everything else,
21 actually.

22 MR. WOODWARD: No. You're harassing him.
23 I'd like to move on.

24 MS. DELGADO: Not at all.

25

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 BY MS. DELGADO:

2 Q Do you have any reason that you would have
3 made up a story like this?

4 MR. WOODWARD: Objection. He --

5 (Simultaneous speakers)

6 MR. WOODWARD: You're mischaracterizing
7 his testimony.

8 MS. DELGADO: I'm asking him. He just
9 stated it wasn't true.

10 BY MS. DELGADO:

11 Q Brad, do you have any --

12 A It's not true.

13 Q -- reason that you would have made up a
14 story?

15 A I don't remember saying this to you, so
16 there's nothing to be made up.

17 Q Brad, isn't it true that my informing Eric
18 and my bringing this up in an e-mail in July of 2023
19 has soured your ability to be truthful here today?

20 (Simultaneous speakers)

21 THE WITNESS: No.

22 BY MS. DELGADO:

23 Q That did not effect your view of me that I
24 disclosed this to Eric?

25 A No. It's not true.

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 Q Well, but if it's not true then that would
2 make you dislike me; would it not?

3 A I didn't say it. I don't remember saying
4 it. It's not true so why -- why would I be mad at
5 something that's not true.

6 Q Admitting that it's true, Brad, would ruin
7 your entire relationship with Trump world, wouldn't
8 it, a current client of your, correct?

9 MR. WOODWARD: Now, you're harassing him.
10 I'm directing him not answer.

11 MS. DELGADO: I'm not harassing him.
12 That's your opinion.

13 It goes directly to the witness's
14 credibility.

15 MR. WOODWARD: I'm directing him not to
16 answer.

17 MS. DELGADO: Based on what, privilege?

18 MR. WOODWARD: Based on you're harassing
19 him about a subject that has nothing do with
20 the litigation.

21 MS. DELGADO: Directing a witness not to
22 answer because you feel I'm harassing your
23 client is not, and you know this --

24 (Simultaneous speakers)

25 THE WITNESS: If it was true -- if it

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 was --

2 (Simultaneous speakers)

3 THE WITNESS: AJ, if it was true, I would
4 tell the truth under oath, and I would do it in
5 a heartbeat. It's not true. And it never
6 happened. So whatever you think happened,
7 didn't happen.

8 So it's not about me to lie. I don't need
9 to lie. And if it was true, I would
10 100 percent say it. I owe them nothing.

11 BY MS. DELGADO:

12 Q The Trump campaign is a client of yours;
13 correct?

14 A Yes. Not my biggest anymore.

15 Q Correct.

16 And your position is that Eric Trump
17 has never contacted you?

18 MR. WOODWARD: Objection. That's not what
19 he said.

20 THE WITNESS: I said we've had very
21 little --

22 (Simultaneous speakers)

23 BY MS. DELGADO:

24 Q Your position is that Eric Trump has never
25 contacted you about this?

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 A I don't remember if he did. If he did it
2 was -- I don't remember. Honestly, I don't remember
3 what -- what he said. I -- we have had very, very
4 infrequent conversations. I mean, I would say we've
5 talked a couple times.

6 Q This is last summer. There isn't going
7 back eight years.

8 A Okay. I don't -- I don't remember
9 February -- I'm sorry, I don't -- I don't remember
10 every single thing that happened with you, AJ. This
11 is your life, so you remember everything.

12 Q Eric Trump has never contacted you and
13 said, I just heard that you told AJ XYZ?

14 A He might have. I -- no, I don't think he
15 said anything close to that. I mean, I don't -- I
16 don't have -- if you show me something that you
17 think you said he said to me, I'll say yes or no
18 whether he did.

19 Q Sure. Okay. Happy to do that. I'll
20 share the screen. This will be Exhibit 13.

21 (Exhibit 13 was marked for
22 identification)

23 BY MS. DELGADO:

24 Q Okay. Here is the text message I have
25 with Eric, which he somehow failed to produced for

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 his deposition. But I have it.

2 I'll give you a second to read.

3 A Okay.

4 Q You done?

5 A Yeah. I mean, he clearly says that he has
6 no idea what this is either.

7 Q So your position is after receiving this
8 Eric didn't contact you?

9 A I don't remember if he did or not. I
10 actually really don't. But if he did he wasn't --
11 he wasn't upset with me. Because it's not true. We
12 both know it's not true, so why would he be mad at
13 me?

14 Q Okay. So your position is not only that
15 it's not true, but that you never relayed such a
16 story to me?

17 A I have no recollection of doing that. You
18 have always told me I have and I never remembered or
19 ever thought I have.

20 Q Okay.

21 MS. DELGADO: We'll take a two --
22 two-minute break. I think that I have one more
23 exhibit and then we can wrap up in time.

24 (Recess.)

25

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 MS. DELGADO: So Mr. Woodward, to recap
2 you're still -- you said that we could circle
3 back at the end.

4 You're still saying your client can't
5 answer who is paying for your services here
6 today or in this matter?

7 MR. WOODWARD: Actually, you can ask him
8 that question again.

9 BY MS. DELGADO:

10 Q Brad, are you paying for Mr. Woodward's
11 services or is someone paying him for you?

12 A Someone else is paying for him under my
13 contract.

14 Q I'm sorry. Grainy again.

15 A Someone else -- someone else is paying for
16 them.

17 Q Who is that?

18 A I couldn't tell you actually the team now,
19 but this all dates back to my contracts which
20 indemnify me from things happening during the
21 campaign.

22 Q So is it the Trump -- Trump PAC who is
23 paying for Mr. Woodward?

24 A Again, I can't tell you it's the -- I'm no
25 longer part of the organization. I had contracts

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 that indemnify me from these lawsuits. And under my
2 agreement of the contracts, Mr. Trump or whatever
3 organization was -- was to pay for them.

4 I -- you would have to ask their
5 attorneys and their people who that actually is.
6 I'm not -- I don't have transparency to that.

7 BY MS. DELGADO:

8 Q Do you have a copy of those contracts?

9 A The campaign would have them. You'd have
10 to ask the '16 campaign. I don't know where --
11 where those exist now. It's a long time ago.

12 Q Do they provide that you'll receive
13 covered legal services?

14 A Yeah. When I originally joined -- I had
15 myself indemnified from lawsuits over the years.
16 That's what I've been told by my attorneys.

17 Q Okay. So the Trump campaign -- you're not
18 paying anything for Mr. Woodward's fees. They're
19 being covered by some element of the Trump Org?

20 A A hundred percent. Yes.

21 Q Okay. That's all I needed.

22 And I think there was one other
23 question to circle back on.

24 Oh, yeah. It's about the attorneys
25 you have spoken to.

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 MS. DELGADO: Mr. Woodward, were you still
2 of the position that he's not able to say what
3 the communications were about? If it was
4 about --

5 (Simultaneous speakers)

6 MS. DELGADO: I'm sorry?

7 MR. WOODWARD: Can we go off the record to
8 discuss this?

9 MS. DELGADO: The two of you or do you
10 mean you and I?

11 MR. WOODWARD: No, you and I.

12 MS. DELGADO: Sure. No problem. Can we
13 go off the record a minute?

14 *(Discussion off the record).*

15 MS. DELGADO: We had a -- we went off the
16 record for a second to try to work out the
17 disagreement over asking Mr. Parscale regarding
18 what communications he had with attorneys about
19 me. Which we'll just leave then for now as
20 they're objecting on the grounds, Mr. Woodward,
21 that it would inevitably probe attorney/client
22 privilege.

23 Is that correct?

24 MR. WOODWARD: Yes, ma'am.

25 MS. DELGADO: Okay. And if those

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 communications are requested, would you provide
2 a privilege log?

3 MR. WOODWARD: You'd -- again, you'd have
4 to go off the record to talk about this.

5 MS. DELGADO: Okay. We're at 12:30,
6 12:31. I'm trying to get you out of here
7 because I do sympathize with your schedule
8 today. I don't see the need to go off the
9 record to discuss that.

10 Could you provide a privilege log? Since
11 you've taken that they're attorney/client
12 privileged or would probe attorney-client
13 privilege.

14 Could you provide a privilege log as to
15 the communications you've had? Just identify
16 the attorney, the approximate dates. That's
17 standard. In fact, I believe that would have
18 been -- that was required in -- via the
19 Attachment A because that would be responsive
20 to all communications with any third party.
21 That would include an attorney.

22 Of course, that -- in that situation, you
23 wouldn't give me the communication. I agree
24 it's privileged. But you would provide me a
25 privilege log, and it would list the dates and

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 the attorney. And per Southern District of New
2 York rule, the relationship, i.e., this was
3 Brad's attorney or this was the campaign's
4 attorney. Identify the relationship therein.

5 So I'd be happy to work with you to
6 receive that privilege log in the next week or
7 so if you could do that.

8 MR. WOODWARD: Do you have any other
9 questions for Mr. Parscale?

10 MS. DELGADO: No. I'm not going off of
11 that because that is responsive and essentially
12 admitted that there are responsive documents.
13 It seems a privilege log was owed under
14 Attachment A.

15 So are you going to produce that?

16 (Simultaneous speakers)

17 MR. WOODWARD: We can go off the record to
18 talk.

19 MS. DELGADO: He admitted he's had
20 conversations about me with Alex Cannon. But
21 there was no privilege log produced. And I
22 believe the Southern District of New York Rules
23 require a privilege log even for oral
24 communications, not just written
25 communications.

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 So is that going to be produced?

2 MR. WOODWARD: We're going to end the
3 deposition now.

4 MS. DELGADO: No. You don't say when the
5 deposition ends.

6 Are you going to produce it because it was
7 required?

8 MR. WOODWARD: The Court ordered that the
9 deposition conclude at 12:30. It's now 12:32.

10 (Simultaneous speakers)

11 MS. DELGADO: We've gone off the record
12 multiple times and asked for at least two
13 breaks.

14 MR. WOODWARD: Okay. We're finished.

15 (Simultaneous speakers)

16 MS. DELGADO: We'll close this out in the
17 next ten seconds guaranteeing that you'll
18 provide the privilege log, which you are
19 obligated to provide. Or I can do a motion to
20 compel, it's fine.

21 We'll just do a motion to compel and take
22 up the judge's time unnecessarily because you
23 are obligated to provide that privilege log and
24 you didn't.

25 It's fine. You concluded -- I'll conclude

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 the deposition. You are in violation of what
2 you were supposed to bring. You didn't bring,
3 you didn't provide a privilege log. And I'll
4 do a motion to compel. That's it.

5 (Simultaneous Speakers)

6 MR. WOODWARD: We would designate --

7 MS. DELGADO: We can go off the record --

8 (Simultaneous speakers)

9 MR. WOODWARD: We --

10 MS. DELGADO: Unless you have something to
11 say. I don't mean to interrupt you.

12 MR. WOODWARD: We will designate the
13 deposition as confidential under the protective
14 order in this case. And we would like to
15 renew --

16
17 (Simultaneous speakers)

18 MS. DELGADO: I'm not designating the
19 deposition as confidential. And you don't get
20 to designate it as confidential.

21 And I don't agree this deposition is
22 confidential.

23 MR. WOODWARD: Okay. We -- we are
24 designating the deposition as confidential
25 under the protective order in the case and we

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 would like to --

2 (Simultaneous Speakers)

3 MS. DELGADO: Disagree. This deposition
4 is not confidential. And I don't believe any
5 deposition has been deemed confidential. So
6 your words are meaningless there. It's not
7 confidential.

8 Good luck at your hearing today. I'm
9 concluding the deposition. Nice seeing you
10 Brad, take care.

11 Nice seeing you, Mr. Blumetti.

12 Court reporter, we can go off the record.

13 *(The deposition was concluded at*
14 *12:34 p.m.)*

15

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*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

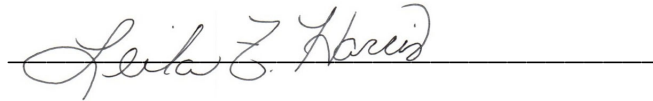
CERTIFICATE OF OATH

STATE OF FLORIDA)

COUNTY OF WALTON)

I, the undersigned authority, certify
that BRADLEY PARSCALE remotely appeared before me
and was duly sworn.

WITNESS my hand and official seal
this 12th of April, 2024.



Leila Z. Harris, Stenographic Court Reporter

Notary Public - State of Florida

Commission No: HH 144004

My Commission Expires: September 13, 2025


*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 STATE OF FLORIDA)

2 COUNTY OF WALTON)

3 I, Leila Z. Harris, LCR (Tennessee), Court
4 Reporter, certify that I was authorized to and did
5 stenographically report the foregoing deposition;
6 and that the transcript is a true record of the
7 testimony given by the witness; Per Federal Civil
8 Procedure Rule 30(e) deponent witness did request to
9 read and sign transcript.

10 I further certify that I am not a
11 relative, employee, attorney, or counsel of any of
12 the parties, nor am I a relative or employee of any
13 of the parties' attorney or counsel connected with
14 the action, nor am I financially interested in this
15 action.

16
17 
18 _____
19 Leila Z. Harris, LCR, FPR
20 Stenographic Court Reporter
21
22
23
24
25

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

Please attach to the 4/12/24 deposition of BRADLEY PARSCALE in the case of Delgado vs. Trump.

INSTRUCTIONS: Please read the transcript of your deposition and make note on this page of any changes. Do not mark on the transcript itself. Please sign and date this sheet.

ERRATA SHEET

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Under penalties of perjury, I declare that I have read my deposition and that it is true and correct subject to any changes in form or substance entered here.

DATE

BRADLEY PARSCALE

Reporter LZH

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

Jeannie Reporting
28 W. Flagler Street, Suite 610
Miami, Florida 33130
(305) 577-1705

May 2, 2024

BRADLEY PARSCALE
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skylar@brandwoodwardlaw.com

Re: Delgado vs. Trump

Dear Mr. Parscale:

Attached please find attached a complimentary copy of your deposition which was taken in the above-styled cause on April 12, 2024. Also attached is an Errata Sheet to be completed by you when reading your copy of the deposition. Sign below to waive review of the transcript.

After you have completed the Errata Sheet, please return it via email to leila@jeanniereporting.com for inclusion in the original transcript. It is suggested that the review of this transcript be completed within 30 days of your receipt of this letter, as considered reasonable under Federal Rules; however, there is no Florida Statute to this regard.

The original of this transcript has been forwarded to the ordering party and your errata, once received, will be forwarded to all ordering parties for inclusion in the transcript.

Sincerely,

Leila Z. Harris, Stenographic Court Reporter

cc: Counsel of record

*April 12, 2024 in re: Delgado v Trump for President
Deposition of Bradley Parscale*

1 Waiver:

2
3 I, _____, hereby waive the reading &
4 signing of my deposition transcript.

5 _____
6 Deponent Signature

_____ Date

{PLAINTIFF} v.
{DEFENDANT}{WITNESSNAME}
{DATE}

<p>BY MS. DELGADO: [119] 5/14 7/11 11/1 11/24 12/20 13/13 14/21 15/9 17/18 20/2 22/3 23/25 24/7 25/7 25/16 26/3 27/19 30/10 30/25 31/19 33/4 33/21 34/7 35/1 35/10 35/25 36/10 38/11 39/3 40/1 42/3 43/16 44/14 46/7 46/25 48/14 48/17 49/3 49/9 50/9 51/7 51/19 52/10 54/2 54/24 55/9 55/18 56/5 57/24 58/7 59/16 59/21 60/20 67/24 68/8 69/2 69/7 69/17 70/13 71/15 72/1 73/14 73/25 74/4 75/12 77/7 77/18 78/19 79/7 80/10 80/13 80/17 81/23 82/4 82/14 82/22 84/16 85/11 87/2 88/2 88/15 89/1 91/6 91/14 92/5 93/9 93/17 94/7 95/22 96/7 96/13 97/7 97/14 98/13 99/11 99/15 99/21 100/4 100/12 101/11 101/24 103/4 103/17 104/21 106/20 107/21 108/13 108/20 108/23 109/12 110/14 110/25 111/10 111/22 113/11 113/23 114/23 116/9 117/7 MR. BLUMETTI: [41] 22/19 22/24 23/10 23/18 25/20 26/7 26/22 28/21 29/6 30/5 31/18 32/23 34/3 34/19 36/5 36/23 45/9 45/18 46/19 48/1 49/22 54/18 55/5 55/15 59/19 60/18 68/4 76/2 76/9 76/13 76/22 79/1 80/2 81/18 82/9 91/5 91/13 93/4 93/14 94/3 101/23 MR. WOODWARD: [153] MS. DELGADO: [139] STENOGRAPHER: [1] 5/2 THE WITNESS: [60] 5/12 11/22 12/18 15/6 17/7 19/18 24/22 25/14 25/21 26/9 26/12 27/8 34/4 34/20 35/9 36/6 43/15 44/12 46/20 48/5 49/23 51/3 54/20 55/8 55/16 56/4 57/22 59/20 68/5 68/23 71/24 72/24 73/24 74/23 75/6 75/9 77/13 77/15 78/17 79/2 80/3 81/19 87/20 88/13</p>	<p>88/23 91/12 93/5 93/15 94/4 96/5 98/12 99/25 100/10 103/2 106/8 108/12 111/21 112/25 113/3 113/20 \$ \$1,500 [1] 17/1 ' '10 [1] 16/5 '16 [3] 14/3 102/14 117/10 1 10 [3] 97/4 97/5 97/8 100 percent [1] 113/10 10006 [1] 2/12 10:00 [1] 1/14 11 [2] 103/15 103/19 11764 [1] 1/3 12 [6] 1/13 35/7 35/22 104/18 104/19 127/13 12/24/16 [1] 3/12 12:30 [3] 50/6 119/5 121/9 12:31 [1] 119/6 12:32 [1] 121/9 12:34 [2] 1/14 123/14 12th [1] 124/9 13 [3] 114/20 114/21 124/15 136 [1] 2/3 144004 [1] 124/14 14th [2] 19/24 54/22 15th [1] 54/22 16 [1] 3/12 16th [1] 19/25 17 [2] 3/8 22/11 1705 [1] 127/2 17th [1] 35/18 19 [1] 24/12 19-CV-11764 [1] 1/3 1:59 [1] 106/1 1st [1] 35/6 2 2.5 [1] 10/14 20006 [2] 2/19 127/7 2001 [2] 2/19 127/7 2008 [1] 50/13 2009 [1] 16/5 2015 [1] 16/20 2016 [25] 12/10 13/15 14/11 16/3 20/5 20/21 44/21 47/10 55/2 55/13 61/13 62/15 64/18 64/21 68/10 68/23 69/11 73/20 74/14 86/16 91/9 91/25 98/25 101/17 102/1 2017 [8] 3/8 21/12 21/19 22/11 25/18 52/24 53/15 89/9 2018 [6] 3/9 3/11 31/3</p>	<p>33/25 47/14 47/17 2019 [2] 72/4 74/19 2020 [37] 13/15 59/25 60/8 60/10 60/11 60/15 60/24 61/10 61/13 61/25 62/15 62/17 63/1 63/25 64/10 64/13 64/17 68/2 68/10 68/12 68/15 68/19 68/24 69/10 69/12 70/7 70/8 70/25 73/21 87/24 90/2 90/2 90/5 91/16 93/20 101/18 102/15 2022 [5] 3/17 82/6 85/7 94/15 95/8 2023 [5] 4/4 87/5 105/1 106/1 111/18 2024 [4] 1/13 124/9 127/4 127/13 2025 [1] 124/15 212-530-4831 [1] 2/12 22 [1] 53/14 24 [3] 31/11 44/21 126/1 26 [1] 29/8 28 [1] 127/1 2:21 p.m [1] 106/4 2:27 [1] 106/18 3 30 [6] 3/11 33/24 35/5 69/4 125/8 127/17 305 [1] 127/2 32nd [1] 2/11 33130 [1] 127/2 33135 [1] 2/4 33rd [1] 2/3 3400 [1] 2/4 3:10 p.m [1] 106/7 4 4/12/24 [1] 126/1 40 [1] 2/11 4831 [1] 2/12 5 50 [1] 22/7 577-1705 [1] 127/2 6 610 [1] 127/1 7 700 [1] 76/1 7049 [2] 2/20 127/8 7th [1] 106/7 8 897 [1] 70/21 8:41 [1] 35/6 8:51 p.m [1] 35/5 A a.m [2] 24/14 35/6 above-styled [2] 1/21</p>	<p>127/13 absolutely [4] 29/6 47/10 108/4 110/9 absurd [1] 61/8 abused [1] 93/25 accent [1] 66/17 according [1] 107/5 accountant [1] 14/6 accounting [4] 13/2 13/2 13/4 13/5 accurate [2] 24/17 32/6 accused [1] 108/10 acting [2] 5/7 66/15 action [2] 125/14 125/15 actions [1] 91/25 actual [2] 41/12 41/21 add [1] 96/25 additional [3] 98/9 98/14 98/16 address [1] 7/16 addresses [1] 104/24 administered [1] 5/3 Administration [1] 94/14 admirable [1] 92/25 admitted [2] 120/12 120/19 Admitting [1] 112/6 advance [2] 10/20 63/10 advertising [4] 13/3 13/3 13/9 16/18 advice [2] 8/12 108/18 aftermath [1] 21/24 ago [8] 11/23 13/24 13/24 20/4 36/14 58/3 109/8 117/11 agree [5] 65/7 65/8 79/25 119/23 122/21 agreed [1] 27/14 agreement [1] 117/2 ahead [11] 22/8 23/23 23/24 26/21 27/7 28/8 40/2 46/6 60/19 70/10 74/5 airplane [1] 16/7 AJ [26] 3/7 3/10 3/20 3/23 4/3 5/17 11/18 13/19 20/20 22/6 24/22 27/21 34/8 34/20 42/13 45/1 49/24 55/17 57/6 71/24 94/24 105/25 106/6 113/3 114/10 114/13 ajdelgado [1] 2/5 AL [1] 1/8 Alex [3] 39/24 42/10 120/20 allegations [1] 64/11 alleged [1] 108/11 allowed [6] 40/9 40/21 61/11 63/15 64/3 83/13 almost [2] 14/5 100/17</p>	<p>Amanda [1] 16/21 AMENDMENT [1] 126/6 America [4] 21/13 21/16 24/13 24/20 American [1] 89/20 amount [4] 14/8 17/23 17/24 41/16 Analytica [2] 57/9 57/17 animus [2] 48/22 49/4 announced [1] 57/4 anonymous [1] 5/24 answer [51] 6/22 7/24 8/10 8/14 8/20 8/22 9/1 9/8 9/17 10/1 10/7 25/12 26/10 26/17 26/20 27/5 27/5 37/18 40/8 40/19 41/1 48/18 49/10 55/19 60/17 60/21 60/23 61/6 62/19 63/4 63/12 63/15 63/23 65/12 65/12 65/13 65/17 66/2 66/6 67/5 67/16 69/9 75/8 89/24 99/23 100/16 104/9 112/10 112/16 112/22 116/5 answered [1] 36/8 answering [3] 10/2 65/10 75/10 answers [3] 10/16 48/24 49/6 apart [6] 34/22 35/2 35/7 35/16 35/22 101/18 apologize [6] 11/20 28/12 43/22 86/19 89/23 94/24 appearance [1] 38/15 appearances [2] 1/22 20/10 appeared [1] 124/5 appreciate [1] 41/17 approached [1] 74/20 approximate [1] 119/16 April [6] 1/13 3/11 33/24 35/5 124/9 127/13 April 30 [1] 33/24 area [1] 20/23 arguing [1] 8/17 ARLENE [3] 1/5 2/3 6/5 aside [2] 36/18 38/14 asserting [4] 8/14 9/24 61/7 63/13 associated [2] 89/5 89/7 Associates [1] 88/10 assume [4] 6/22 22/17 31/7 100/23 assure [1] 5/23 Atlanta [1] 108/6</p>
---	---	--	--	--

A	<p>bathroom [2] 6/13 67/3</p> <p>bear [3] 6/10 28/14 86/20</p> <p>becoming [1] 16/8</p> <p>beginning [2] 17/8 51/24</p> <p>belief [1] 92/25</p> <p>bell [7] 46/9 70/1 95/23 95/24 107/6 107/7 107/8</p> <p>below [1] 127/14</p> <p>best [2] 27/16 81/21</p> <p>better [1] 60/9</p> <p>between [12] 3/7 3/10 3/22 4/3 13/14 20/8 22/10 33/24 62/15 67/16 82/5 104/25</p> <p>bid [2] 16/10 17/1</p> <p>big [3] 54/11 54/11 105/15</p> <p>biggest [1] 113/14</p> <p>birthday [3] 19/22 19/24 20/1</p> <p>bit [5] 15/23 16/2 102/13 104/14 105/9</p> <p>black [1] 87/9</p> <p>blacked [1] 105/22</p> <p>blessed [1] 16/5</p> <p>blue [1] 78/6</p> <p>BLUMETTI [8] 2/10 11/11 29/19 32/19 45/16 66/20 75/24 123/11</p> <p>board [2] 78/4 91/1</p> <p>book [1] 49/15</p> <p>Bossie [1] 59/9</p> <p>bother [1] 77/5</p> <p>bottom [1] 105/5</p> <p>bought [1] 14/8</p> <p>Brad [56] 5/18 6/6 11/2 12/1 22/10 24/2 26/15 26/21 27/7 30/11 31/2 31/20 33/5 33/22 35/11 37/22 42/4 44/17 46/8 48/21 49/4 50/10 50/24 51/22 52/1 54/9 59/11 61/19 66/20 67/25 68/16 72/3 74/18 77/9 77/14 82/5 82/15 84/17 85/12 86/12 87/5 87/23 88/9 92/7 94/13 96/14 97/20 99/12 99/22 104/24 105/11 111/11 111/17 112/6 116/10 123/10</p> <p>Brad's [2] 106/4 120/3</p> <p>BRADLEY [11] 1/17 3/2 3/7 4/3 5/8 7/14 105/25 124/5 126/1 126/22 127/5</p> <p>Brand [2] 2/18 127/6</p> <p>branding [1] 16/19</p> <p>brandwoodwardlaw.com [4] 2/20 2/21 127/8 127/9</p>	<p>break [20] 6/12 6/14 33/8 33/14 37/19 49/2 49/25 50/12 65/8 65/13 66/9 66/25 67/2 67/2 67/3 67/4 67/14 68/16 69/8 115/22</p> <p>breaks [1] 121/13</p> <p>Brian [7] 55/21 55/25 56/1 56/2 56/22 56/25 59/6</p> <p>bring [7] 78/4 78/24 90/8 94/9 103/25 122/2 122/2</p> <p>bringing [4] 79/3 79/5 91/1 111/18</p> <p>brought [2] 44/25 92/11</p> <p>build [1] 15/7</p> <p>building [1] 14/2</p> <p>bunch [1] 56/13</p> <p>business [1] 54/6</p>	<p>C</p> <p>C/O [1] 127/6</p> <p>cabinet [1] 81/7</p> <p>Cambridge [2] 57/9 57/17</p> <p>camera [5] 50/25 84/2 84/6 84/12 105/22</p> <p>campaign [103] 11/13 12/10 14/1 14/11 15/10 15/12 15/15 15/17 16/3 19/4 19/6 19/8 19/10 19/12 19/13 20/6 20/11 22/17 39/6 39/7 39/12 40/3 40/5 40/7 40/22 52/19 53/1 53/4 53/7 55/13 57/10 57/12 57/13 57/16 57/18 57/20 57/23 58/17 58/21 59/5 59/25 60/8 60/10 60/11 60/13 60/15 60/24 61/10 61/13 61/13 62/1 62/15 62/16 62/17 63/2 64/1 64/10 64/13 64/17 64/18 64/21 65/22 65/23 68/2 68/11 68/12 68/15 68/18 68/20 68/23 69/8 69/13 69/22 70/6 70/18 72/5 72/17 73/5 73/6 73/20 74/16 79/21 81/21 85/17 86/15 88/11 89/13 90/25 91/3 93/20 100/18 100/18 101/8 101/14 101/18 102/4 104/5 107/3 113/12 116/21 117/9 117/10 117/17</p> <p>campaign's [1] 120/3</p> <p>campaigns [1] 68/24</p> <p>cancel [1] 15/8</p> <p>candidacy [2] 12/2 12/5</p>	<p>Cannon [3] 39/24 42/10 120/20</p> <p>capacities [1] 100/19</p> <p>capacity [2] 5/7 104/8</p> <p>care [1] 123/10</p> <p>case [8] 1/3 8/4 29/10 87/4 103/21 122/14 122/25 126/1</p> <p>categories [2] 7/9 100/22</p> <p>caught [1] 89/25</p> <p>cc [1] 127/25</p> <p>certain [3] 7/2 23/10 39/19</p> <p>certainly [3] 10/14 16/1 63/25</p> <p>CERTIFICATE [1] 123/17</p> <p>certify [3] 124/4 125/4 125/10</p> <p>chance [2] 77/10 87/8</p> <p>change [1] 82/15</p> <p>changes [2] 126/3 126/20</p> <p>charge [2] 57/1 102/14</p> <p>charging [2] 17/4 17/12</p> <p>chat [2] 86/10 96/2</p> <p>chatting [1] 24/19</p> <p>check [2] 23/3 98/20</p> <p>checks [1] 18/6</p> <p>choice [3] 81/9 81/12 81/13</p> <p>choose [2] 92/23 92/23</p> <p>choosing [1] 81/20</p> <p>chronologically [2] 105/6 105/10</p> <p>circle [8] 8/19 10/6 10/24 60/12 72/2 94/8 116/2 117/23</p> <p>city [2] 7/16 54/7</p> <p>Civil [1] 125/7</p> <p>claim [1] 89/2</p> <p>claiming [5] 8/2 8/7 9/12 9/14 41/25</p> <p>claims [1] 29/9</p> <p>clarification [1] 12/22</p> <p>clarify [3] 58/21 60/6 92/6</p> <p>clean [1] 15/1</p> <p>clear [9] 10/9 10/23 26/18 31/20 45/25 63/20 76/21 80/18 104/9</p> <p>clearly [4] 37/21 61/1 67/8 115/5</p> <p>client [38] 8/7 8/10 8/10 8/25 9/7 9/25 15/12 15/18 36/24 40/19 41/1 41/15 53/16 60/12 61/5 63/3 63/11 63/15 63/23 64/7 64/9 65/17 66/2 66/4 66/12 67/5 67/15 84/1 84/6 84/9 87/10 112/8</p>	<p>112/23 113/12 116/4 118/21 119/11 119/12</p> <p>clients [1] 15/19</p> <p>close [4] 74/12 96/9 114/15 121/16</p> <p>closely [2] 18/17 18/17</p> <p>coached [1] 27/4</p> <p>coaching [1] 26/16</p> <p>colleagues [1] 44/20</p> <p>collective [1] 90/8</p> <p>comfortable [3] 64/14 65/9 95/1</p> <p>comment [1] 96/25</p> <p>Commission [2] 124/14 124/15</p> <p>committee [4] 19/8 19/15 19/19 19/23</p> <p>common [1] 6/9</p> <p>communicating [1] 53/20</p> <p>communication [8] 1/12 3/7 3/10 41/6 53/16 98/17 100/13 119/23</p> <p>communications [23] 23/11 23/13 38/13 38/18 41/5 41/9 41/12 41/22 42/4 52/18 52/24 53/6 98/24 100/2 100/20 100/24 118/3 118/18 119/1 119/15 119/20 120/24 120/25</p> <p>companies [4] 12/11 14/2 15/7 68/25</p> <p>company [10] 13/25 14/1 14/7 15/15 52/1 52/7 52/11 52/25 54/4 88/20</p> <p>compared [1] 49/13</p> <p>compel [3] 121/20 121/21 122/4</p> <p>compensation [2] 89/14 89/20</p> <p>complaining [2] 69/13 102/9</p> <p>complaint [1] 102/21</p> <p>complaints [13] 60/3 61/18 65/21 68/1 68/20 69/19 93/10 101/17 102/2 102/5 102/6 102/7 102/16</p> <p>completed [3] 127/13 127/15 127/17</p> <p>completely [2] 89/8 107/18</p> <p>complimentary [1] 127/12</p> <p>compound [3] 48/25 49/7 101/21</p> <p>computer [2] 6/1 6/1</p> <p>concede [1] 110/7</p> <p>conceded [1] 23/12</p> <p>conceding [1] 29/14</p> <p>conception [1] 80/4</p> <p>concern [3] 91/1 91/23</p>
----------	--	---	---	--	--

C concern... [1] 93/1 concerned [1] 102/9 concerns [2] 38/23 91/17 conclude [4] 61/2 63/5 121/9 121/25 concluded [2] 121/25 123/13 concluding [1] 123/9 conduct [1] 91/20 confidential [14] 3/15 76/3 76/10 76/18 76/19 82/11 122/13 122/19 122/20 122/22 122/24 123/4 123/5 123/7 confidentiality [4] 76/15 77/3 77/6 82/11 connected [1] 125/13 connecting [1] 21/12 consider [1] 12/1 considered [1] 127/17 constant [1] 29/25 Consultants [1] 89/20 contact [1] 115/8 contacted [4] 109/9 113/17 113/25 114/12 contending [1] 45/25 content [4] 38/17 40/10 40/10 41/20 context [1] 31/5 continue [5] 9/21 9/23 9/24 66/2 76/17 Continued [2] 3/24 4/1 continues [1] 106/10 contract [5] 57/15 57/17 57/19 57/23 116/13 contracts [4] 116/19 116/25 117/2 117/8 control [1] 79/20 controlling [1] 65/3 conversation [10] 26/5 28/7 32/8 37/2 37/9 40/13 47/22 48/4 78/13 103/19 conversational [1] 80/6 conversations [9] 25/23 27/10 27/13 38/13 40/20 43/3 43/10 114/4 120/20 conveyed [1] 72/16 Conway [1] 74/6 copy [5] 75/25 76/7 117/8 127/12 127/14 core [1] 40/17 correct [30] 14/15 14/23 17/21 18/4 34/10 34/16 35/21 38/15 43/11 46/1 46/5 52/7 53/21 56/23 59/6 60/1 66/13 72/18 74/7 87/14 92/1 94/15 97/1 97/22	109/20 112/8 113/13 113/15 118/23 126/19 correctly [1] 89/16 Correspondence [4] 3/12 3/18 3/22 4/3 cost [1] 17/17 counsel [6] 6/14 65/1 109/5 125/11 125/13 127/25 counts [1] 101/5 COUNTY [2] 124/3 125/2 couple [5] 18/24 20/21 21/3 102/10 114/5 course [9] 29/23 36/19 45/6 47/2 48/19 73/24 76/18 91/12 119/22 court [13] 1/1 1/19 8/24 31/21 61/21 62/9 66/21 121/8 123/12 124/13 125/3 125/18 127/24 covered [2] 117/13 117/19 COVID [1] 93/16 cracks [1] 89/25 credibility [2] 110/20 112/14 credible [1] 8/5 criminal [1] 56/25 critical [1] 73/22 crosstalk [1] 89/25 cuff [1] 79/14 culture [1] 15/8 current [2] 98/25 112/8 cut [1] 84/23 CV [1] 1/3 cycle [9] 68/2 68/12 68/19 69/9 69/13 70/18 73/21 91/10 102/1 cycles [1] 101/18	decision [7] 70/24 71/1 81/17 85/18 85/25 90/1 90/3 decisions [1] 86/15 declare [1] 126/19 deemed [1] 123/5 defamation [1] 109/13 defend [1] 49/20 Defendant [1] 2/15 Defendants [1] 1/9 definition [1] 64/23 delay [5] 15/23 70/16 88/17 90/17 104/13 delayed [1] 104/14 delete [1] 100/5 DELGADO [46] 1/5 2/3 3/8 3/10 3/20 3/23 4/4 7/7 8/23 10/4 22/24 26/22 28/25 30/15 33/7 36/8 36/9 40/18 40/23 40/25 43/2 45/3 45/24 50/1 51/2 52/19 53/15 60/5 62/14 63/25 64/9 75/5 76/2 78/6 82/9 82/19 84/8 87/15 99/3 99/14 99/17 102/20 102/21 105/25 126/1 127/10 Delgados [1] 6/5 Denison [1] 102/23 dental [1] 95/9 department [2] 58/11 58/12 depo [1] 43/8 deponent [2] 125/8 128/5 deposed [4] 5/10 6/6 32/21 84/7 deposition [43] 1/17 1/20 7/1 7/3 9/22 9/23 10/22 11/3 11/4 11/9 45/12 45/17 45/19 45/22 51/16 61/3 61/4 63/5 63/21 66/7 66/16 67/8 99/9 115/1 121/3 121/5 121/9 122/1 122/13 122/19 122/21 122/24 123/3 123/5 123/9 123/13 125/5 126/1 126/3 126/19 127/12 127/14 128/3 depositions [2] 6/9 29/23 description [2] 17/21 58/9 designate [3] 122/6 122/12 122/20 designated [3] 3/15 76/3 82/10 designating [2] 122/18 122/24 designation [3] 76/4 76/19 77/3 destroyed [1] 14/1 detail [2] 41/4 57/8	details [1] 89/11 diatribe [1] 73/1 difference [1] 92/14 difficult [1] 81/20 direct [2] 60/23 120/22 directed [5] 8/14 8/20 9/19 10/7 65/16 directing [7] 8/9 8/21 9/4 9/25 112/10 112/15 112/21 direction [1] 9/23 directly [4] 46/11 46/13 47/5 112/13 director [4] 69/21 69/23 70/2 70/3 Disagree [1] 123/3 disagreement [1] 118/17 disappointed [1] 84/24 disappointing [1] 85/1 disclose [2] 41/11 64/5 disclosed [1] 111/24 discovery [9] 22/21 23/1 23/6 23/20 28/23 29/2 29/4 29/21 29/23 discrimination [6] 60/3 61/18 65/21 67/25 68/21 69/14 discuss [3] 38/6 118/8 119/9 discussed [3] 40/17 41/21 87/25 discussing [1] 64/4 Discussion [2] 95/19 118/14 discussions [2] 41/2 41/4 dislike [1] 112/2 disqualified [1] 88/1 disrespectfully [1] 46/21 disrespecting [1] 6/17 DISTRICT [3] 1/1 1/2 120/1 disturbing [1] 63/10 divulge [1] 64/5 documentation [1] 99/12 documents [9] 7/3 7/7 7/8 23/19 29/20 29/24 76/3 76/20 120/12 dollars [2] 12/24 13/10 Don [2] 18/17 19/3 DONALD [8] 1/8 12/2 12/4 74/13 74/13 79/23 80/5 81/22 double [1] 98/20 doubt [1] 45/14 down [9] 6/15 19/20 19/22 22/7 22/15 24/5 37/21 38/2 44/22 draw [1] 51/22 drink [1] 49/14 drinking [1] 109/19 drug [1] 57/1	drunk [1] 104/2 due [1] 91/19 duly [2] 5/10 124/6 dumb [1] 93/8 during [17] 6/14 16/10 22/21 22/25 23/6 23/20 28/23 29/4 49/21 50/12 60/7 65/22 68/1 68/18 74/13 82/24 116/20
				E e-mail [28] 3/12 3/18 4/3 10/18 16/21 44/18 44/19 53/14 86/24 87/3 87/16 87/19 87/20 104/17 104/24 104/25 104/25 105/1 105/3 105/14 106/17 106/22 107/6 107/10 107/13 108/14 109/17 111/18 e-mails [4] 42/5 100/1 100/14 100/17 early [1] 89/9 earn [1] 12/9 earned [1] 13/22 easier [2] 6/3 96/1 educate [1] 61/12 effect [2] 5/4 111/23 effort [3] 18/1 19/10 55/2 eight [2] 99/16 114/7 either [7] 11/18 17/11 44/25 79/13 92/10 101/5 115/6 elaborate [1] 90/13 election [5] 68/19 70/18 74/14 91/9 102/1 element [1] 117/19 Ellis [7] 3/23 93/18 93/19 93/23 93/24 103/20 104/1 email [2] 2/13 127/15 Email:adelgado [1] 2/5 Email:stanley [2] 2/20 127/8 embarrassing [1] 106/24 employee [7] 52/17 52/23 53/3 53/5 53/20 125/11 125/12 encouraging [2] 49/20 108/3 end [3] 43/8 116/3 121/2 ended [2] 16/8 16/11 ends [1] 121/5 entered [2] 10/10 126/20 entire [3] 94/16 94/18 112/7 entirety [1] 76/9 entitled [1] 105/20 Eric [41] 3/10 3/13 4/5 17/3 17/8 18/17 18/22 18/24 25/8 28/4 32/8

{PLAINTIFF} v.
{DEFENDANT}{WITNESSNAME}
{DATE}

E	Expires [1] 124/15 exploratory [3] 19/8 19/14 19/19 express [3] 90/25 91/16 91/17 expressed [1] 91/23 expression [2] 84/20 84/22 extent [4] 23/14 23/19 28/22 76/23 eyeballs [1] 51/3	F	floor [2] 2/11 54/22 Florida [8] 1/20 5/6 5/7 124/2 124/14 125/1 127/2 127/18 fluoride [1] 95/9 follow [1] 106/17 Following [1] 14/11 follows [1] 5/11 force [1] 5/4 foregoing [1] 125/5 forensic [1] 14/6 form [39] 17/6 22/18 23/22 24/21 25/20 26/7 31/18 34/19 46/19 48/2 52/8 54/17 54/18 55/5 55/6 59/19 60/18 68/3 68/4 71/23 72/23 73/23 74/22 78/5 78/16 78/25 80/2 81/18 88/12 88/22 91/4 91/5 91/11 93/4 93/13 94/2 97/13 98/11 126/20 formal [1] 102/7 format [1] 98/6 formed [1] 19/23 forth [1] 21/1 forwarded [2] 127/19 127/20 four [2] 13/23 17/25 foursome [2] 108/2 108/3 FPR [2] 1/18 125/18 framing [1] 27/8 frankly [1] 65/18 free [1] 69/8 frivolous [1] 41/17 front [4] 74/24 74/25 75/14 75/15 full [2] 7/12 45/5	gray [1] 77/14 great [5] 5/21 24/10 47/24 48/11 54/8 greater [1] 79/20 gross [3] 12/13 12/18 12/25 ground [3] 6/8 8/11 61/5 grounds [1] 118/20 group [1] 16/11 guaranteeing [1] 121/17 guess [2] 16/4 39/9 guessing [1] 19/25 guy [1] 56/4 guys [1] 102/12	74/21 79/15 79/17 80/25 81/5 81/9 81/14 81/14 85/15 87/13 87/24 90/1 hired [9] 52/11 54/5 74/19 75/2 75/3 75/13 75/14 79/20 80/4 hiring [6] 73/21 79/4 80/19 80/21 90/5 90/11 histories [1] 92/12 history [1] 90/24 honest [2] 48/24 49/6 Honestly [1] 114/2 honor [1] 17/14 hope [2] 16/13 86/23 horror [1] 31/11 hotel [1] 108/1 hours [7] 10/5 10/11 10/14 10/16 31/11 35/7 35/22 House [13] 47/14 47/16 55/3 55/14 56/10 56/14 57/4 59/13 59/17 79/19 80/8 90/7 90/10 HR [3] 69/21 69/23 70/3 hundred [4] 12/24 13/6 107/16 117/20
Eric... [30] 32/21 33/2 33/24 34/2 36/3 36/11 51/15 52/6 54/3 78/2 78/23 86/5 86/15 100/24 101/3 101/7 101/13 107/5 107/13 108/2 109/9 109/13 110/16 111/17 111/24 113/16 113/24 114/12 114/25 115/8 Eric's [2] 45/12 45/17 Erica [1] 101/2 errata [4] 126/5 127/13 127/15 127/19 ERROR [1] 126/6 escalator [1] 19/22 especially [2] 26/20 27/5 ESQUIRE [3] 2/10 2/18 127/6 essentially [6] 71/1 71/2 88/5 88/23 109/4 120/11 estate [4] 14/9 16/9 16/11 18/10 ET [3] 1/8 1/14 1/14 ethics [1] 67/20 event [2] 24/25 51/22 eventually [1] 16/18 evidence [1] 73/17 exact [6] 12/12 17/9 70/7 70/15 72/13 89/4 exactly [16] 21/17 25/24 39/16 46/22 47/18 48/10 48/12 49/17 71/6 75/10 79/11 79/15 79/16 94/6 102/6 102/11 EXAMINATION [1] 5/13 example [2] 53/13 74/9 exchanged [1] 22/25 exclusive [1] 43/10 Excuse [2] 26/14 61/16 exhibit [44] 3/6 3/25 21/20 21/25 22/1 22/10 28/17 28/18 28/19 30/9 30/12 32/16 32/17 32/25 33/17 33/23 34/12 34/13 45/7 45/20 51/14 51/17 51/20 75/20 75/21 82/1 82/2 82/16 82/16 86/18 86/23 86/25 94/11 96/3 96/12 97/4 97/5 97/8 103/15 103/19 104/19 114/20 114/21 115/23 Exhibit 11 [1] 103/19 exhibits [7] 3/5 6/2 10/20 10/22 32/23 33/3 63/9 exist [1] 117/11 exists [1] 27/2	face [2] 83/9 83/16 faces [1] 105/16 fact [4] 22/20 66/18 89/13 119/17 failed [1] 114/25 Fair [12] 15/20 20/17 35/20 37/20 37/20 47/12 59/3 72/15 74/17 75/18 89/12 89/22 faith [1] 65/19 fall [1] 29/10 family [5] 16/17 17/14 81/6 86/1 86/5 far [1] 100/1 favor [1] 90/11 fear [1] 64/18 February [2] 19/18 114/9 Federal [2] 125/7 127/18 fees [1] 117/18 fell [1] 89/24 felt [2] 90/14 95/1 fight [1] 15/8 figure [1] 14/6 filed [1] 69/18 final [1] 100/22 financially [1] 125/14 fine [5] 5/20 10/25 15/25 121/20 121/25 finish [3] 10/11 33/9 33/19 finished [2] 83/25 121/14 fire [1] 97/21 firm [1] 29/21 first [22] 5/9 16/16 18/24 19/14 21/13 21/16 21/25 24/3 24/13 24/20 25/25 26/1 26/2 27/9 27/17 27/18 27/18 34/2 58/1 94/11 105/9 105/25 fit [1] 55/19 five [4] 17/25 50/4 50/7 66/4 FL [1] 2/4 Flagler [1] 127/1 flipped [3] 73/9 85/18 85/21 flipping [1] 53/23	G	game [3] 50/14 50/18 97/21 Garrett [2] 58/15 59/5 Garrot [1] 56/13 Gavenman [3] 11/19 11/20 11/21 geeked [1] 50/18 general [1] 41/20 generally [1] 17/21 Giles [4] 51/25 52/3 52/12 53/2 girl [2] 56/9 103/7 girls [1] 102/11 given [7] 5/5 29/25 31/15 44/7 52/6 64/9 125/7 glad [1] 67/22 glasses [3] 22/6 43/19 43/22 Googleman [1] 11/16 Government [1] 95/2 grainy [2] 110/1 116/14 granted [1] 41/11	hair [1] 40/12 hairs [1] 83/1 half [3] 10/5 10/11 10/16 hand [3] 15/23 16/6 124/8 handling [1] 92/17 Hang [2] 28/16 83/12 happy [7] 29/5 38/6 44/25 46/16 92/6 114/19 120/5 harass [6] 61/11 61/19 62/1 62/18 64/20 65/24 harassing [5] 110/22 112/9 112/11 112/18 112/22 harassment [7] 60/4 61/18 65/21 68/1 68/21 69/14 108/8 hard [1] 75/9 Harris [5] 1/18 124/13 125/3 125/18 127/24 harvard.edu [1] 2/5 head [5] 12/6 16/8 21/20 31/23 56/21 headline [1] 93/23 hear [2] 46/17 68/9 heard [7] 6/10 10/21 46/9 61/24 70/16 102/8 114/13 hearing [1] 123/8 hearsay [3] 48/1 48/3 49/22 heartbeat [1] 113/5 help [12] 16/23 16/23 20/15 24/18 31/16 54/6 64/16 77/21 78/3 78/23 85/12 92/16 helped [1] 25/5 hereby [1] 128/3 HH [1] 124/14 highlighted [1] 44/22 highly [2] 65/18 65/18 himself [3] 67/14 67/17 67/18 hinting [1] 26/17 hire [14] 70/24 71/17	I i.e [2] 37/11 120/2 ID [1] 16/14 idea [12] 25/25 26/1 28/1 71/3 71/4 71/9 71/10 71/11 71/12 74/15 79/17 115/6 identification [13] 22/2 28/20 32/18 45/8 51/18 75/22 82/3 87/1 96/4 97/6 103/16 104/20 114/22 identify [3] 41/9 119/15 120/4 impossible [1] 55/17 impregnated [2] 91/2 91/9 impressions [1] 20/9 improperly [2] 10/19 65/17 inaccurate [2] 70/20 88/4 inappropriately [1] 104/2 inauguration [2] 22/13 26/5 incident [2] 107/4 107/13 inclination [1] 74/20 include [5] 59/5 59/6 86/5 91/22 119/21 included [2] 76/13 90/9 including [2] 12/10 53/4 inclusion [2] 127/16 127/20

<p>I</p> <p>incorrect [1] 18/8</p> <p>indemnified [1] 117/15</p> <p>indemnify [2] 116/20 117/1</p> <p>INDEX [3] 3/1 3/5 4/1</p> <p>indicating [1] 71/16</p> <p>individual [3] 57/19 57/23 94/22</p> <p>individuals [8] 28/5 37/22 54/15 55/2 55/12 59/4 73/21 80/1</p> <p>indulge [1] 55/11</p> <p>inevitably [3] 81/8 81/13 118/21</p> <p>influenced [1] 81/16</p> <p>information [4] 9/13 41/19 43/1 43/25</p> <p>informing [3] 93/24 93/24 111/17</p> <p>infrequent [1] 114/4</p> <p>initiated [1] 87/7</p> <p>inquired [2] 44/3 44/6</p> <p>inquiry [1] 79/8</p> <p>inside [1] 58/24</p> <p>instance [2] 37/12 42/5</p> <p>instead [2] 31/21 31/22</p> <p>instructed [1] 80/25</p> <p>instructing [3] 40/19 41/1 63/11</p> <p>INSTRUCTIONS [1] 126/2</p> <p>insulting [1] 65/19</p> <p>intend [2] 10/15 16/1</p> <p>interacting [1] 20/21</p> <p>interactions [1] 20/18</p> <p>interest [1] 65/2</p> <p>interested [2] 72/17 125/14</p> <p>International [2] 16/9 18/10</p> <p>internet [1] 12/15</p> <p>interpreting [1] 15/24</p> <p>interrupt [3] 15/21 99/18 122/11</p> <p>interrupted [2] 33/17 33/19</p> <p>interview [4] 27/20 28/2 94/16 94/18</p> <p>introducing [1] 75/19</p> <p>investments [1] 14/12</p> <p>invitation [1] 62/13</p> <p>involved [1] 102/17</p> <p>involving [1] 36/18</p> <p>Iron [1] 58/16</p> <p>irrelevant [2] 13/18 62/22</p> <p>issue [6] 37/4 41/20 44/24 47/25 48/22 49/5</p> <p>issues [1] 85/23</p> <p>itself [1] 126/3</p> <p>Ivanka [3] 18/18 19/1 19/3</p>	<p>J</p> <p>James [1] 7/14</p> <p>Jamestown [5] 88/10 89/3 89/7 89/9 89/14</p> <p>JARED [14] 2/10 22/16 25/13 32/1 54/19 55/7 71/7 71/8 71/22 78/2 78/23 79/23 86/6 86/14</p> <p>Jason [27] 3/21 45/1 46/18 46/20 55/24 56/7 57/3 57/4 59/8 70/24 74/8 74/10 74/10 74/12 74/15 79/17 80/4 80/19 80/21 88/9 95/8 97/10 98/1 100/25 101/3 101/6 101/18</p> <p>Jason's [1] 21/2</p> <p>jblumetti [1] 2/13</p> <p>Jeannie [1] 126/25</p> <p>jeanniereporting.com [1] 127/16</p> <p>Jenna [4] 3/22 93/18 93/19 103/20</p> <p>job [31] 19/14 21/13 21/16 24/19 25/3 25/3 25/6 25/9 25/11 25/15 25/18 25/23 27/20 47/17 52/7 54/3 55/3 55/14 56/10 57/5 58/8 72/4 72/6 72/7 72/7 72/20 79/8 81/11 81/20 81/20 94/14</p> <p>jobs [1] 56/14</p> <p>jog [1] 78/23</p> <p>John [2] 3/18 87/3</p> <p>joined [2] 19/6 117/14</p> <p>Josh [2] 3/12 44/19</p> <p>Jr [2] 18/17 19/3</p> <p>judge [6] 10/10 10/11 43/7 61/3 63/6 67/7</p> <p>judge's [1] 121/22</p> <p>July [6] 4/4 70/7 105/1 106/1 106/7 111/18</p> <p>July 2020 [1] 70/7</p> <p>July 2023 [1] 105/1</p> <p>July 7th [1] 106/7</p> <p>June [5] 19/21 19/21 19/24 19/25 70/8</p> <p>June 14th [1] 19/24</p> <p>June 16th [1] 19/25</p> <p>K</p> <p>Kathy [1] 16/7</p> <p>Katrina [3] 59/12 72/10 74/19</p> <p>Katty [1] 16/8</p> <p>Kay [2] 16/8 16/8</p> <p>keep [8] 15/17 15/19 45/19 50/7 56/12 66/15 76/17 95/7</p> <p>keeping [1] 77/2</p> <p>Kellyanne [1] 74/6</p> <p>KHP [1] 1/3</p> <p>kind [3] 8/22 17/11</p>	<p>81/7</p> <p>knowledge [1] 65/23</p> <p>knows [2] 37/22 44/5</p> <p>KU [1] 50/13</p> <p>Kushner [1] 79/23</p> <p>L</p> <p>labeled [1] 76/17</p> <p>lack [2] 67/20 86/19</p> <p>laid [1] 74/23</p> <p>language [1] 17/9</p> <p>Lansing [2] 56/13 58/15</p> <p>Lanza [4] 56/2 56/22 56/25 59/6</p> <p>Lara [8] 52/3 52/5 52/11 52/17 53/11 53/14 54/3 54/5</p> <p>Larry [2] 42/15 42/16</p> <p>last [10] 10/18 31/11 34/1 35/19 57/25 66/1 79/8 91/2 99/16 114/6</p> <p>Law [2] 2/18 127/6</p> <p>lawsuit [12] 37/3 37/12 37/25 37/25 40/6 40/7 40/22 64/11 64/24 69/18 100/14 102/24</p> <p>lawsuits [4] 68/14 68/15 117/1 117/15</p> <p>lawyer [3] 7/19 11/10 22/16</p> <p>lawyers [2] 43/3 81/6</p> <p>LCR [3] 1/18 125/3 125/18</p> <p>lean [1] 83/1</p> <p>leaning [1] 83/7</p> <p>learned [1] 57/2</p> <p>least [2] 28/13 121/12</p> <p>leave [1] 118/19</p> <p>leaving [1] 40/4</p> <p>led [3] 16/16 16/20 21/22</p> <p>left [1] 89/21</p> <p>legal [3] 102/7 109/5 117/13</p> <p>legally [1] 40/14</p> <p>leila [6] 1/18 124/13 125/3 125/18 127/16 127/24</p> <p>less [4] 13/9 17/25 50/4 97/10</p> <p>Let's' [1] 42/22</p> <p>letter [1] 127/17</p> <p>level [4] 54/15 55/13 58/22 90/9</p> <p>LHGKC [1] 2/10</p> <p>lhrgb.com [2] 2/13 2/13</p> <p>lie [2] 113/8 113/9</p> <p>lies [1] 85/1</p> <p>lie [2] 104/3 114/11</p> <p>limit [3] 38/24 50/6 59/4</p> <p>limited [1] 41/16</p> <p>line [5] 34/2 53/15 73/8</p>	<p>110/18 126/6</p> <p>list [1] 119/25</p> <p>listed [1] 52/18</p> <p>listening [1] 6/16</p> <p>litany [1] 73/3</p> <p>literally [1] 37/9</p> <p>litigation [4] 9/15 29/13 80/25 112/20</p> <p>LOCATION [1] 1/11</p> <p>log [18] 3/13 22/5 41/8 41/8 41/19 51/15 52/17 119/2 119/10 119/14 119/25 120/6 120/13 120/21 120/23 121/18 121/23 122/3</p> <p>logged [3] 5/23 5/24 5/25</p> <p>logical [1] 65/25</p> <p>logs [1] 41/14</p> <p>looking [5] 6/15 13/16 35/4 35/14 51/1</p> <p>looks [1] 29/15</p> <p>lost [3] 14/6 16/16 50/24</p> <p>loud [1] 34/5</p> <p>luck [1] 123/8</p> <p>lunch [1] 94/18</p> <p>LZH [1] 126/24</p> <p>M</p> <p>ma'am [16] 6/25 7/10 7/21 9/9 9/14 9/18 15/11 15/16 20/12 42/2 52/2 53/22 97/17 97/17 97/19 118/24</p> <p>mad [2] 112/4 115/12</p> <p>mail [28] 3/12 3/18 4/3 10/18 16/21 44/18 44/19 53/14 86/24 87/3 87/16 87/19 87/20 104/17 104/24 104/25 104/25 105/1 105/3 105/14 106/17 106/22 107/6 107/10 107/13 108/14 109/17 111/18</p> <p>mails [4] 42/5 100/1 100/14 100/17</p> <p>main [2] 73/11 79/24</p> <p>males [1] 107/3</p> <p>manager [12] 56/1 56/23 60/13 65/22 65/24 68/11 68/18 69/22 70/6 70/18 79/21 88/11</p> <p>managers [1] 54/15</p> <p>manner [2] 9/22 47/15</p> <p>mark [12] 22/9 28/18 30/11 32/15 51/13 81/25 96/10 96/11 97/4 103/18 104/17 126/3</p> <p>marked [18] 22/1 28/19 32/17 45/7 45/10 45/19 51/17 51/20 54/1 75/21 76/10 82/2 86/25 96/3 97/5 103/15</p>	<p>104/19 114/21</p> <p>marketing [3] 16/14 16/18 17/15</p> <p>marking [4] 33/23 82/16 86/22 97/8</p> <p>matter [5] 7/19 7/23 8/6 96/6 116/6</p> <p>mean [33] 13/23 16/4 17/22 18/9 20/14 20/20 24/16 24/24 26/12 31/8 39/9 42/20 46/14 46/21 47/5 54/20 55/17 56/19 57/12 63/25 69/23 85/23 88/5 93/5 93/19 94/23 100/7 102/7 114/4 114/15 115/5 118/10 122/11</p> <p>meaningless [1] 123/6</p> <p>means [2] 34/23 47/2</p> <p>meant [1] 65/24</p> <p>Media [1] 89/20</p> <p>Megan [1] 70/1</p> <p>Melania [1] 19/2</p> <p>members [2] 16/17 81/7</p> <p>memory [5] 21/10 21/15 78/23 85/13 85/14</p> <p>men [4] 101/17 102/3 102/3 102/17</p> <p>mentioned [8] 17/2 28/5 54/9 56/17 56/22 57/3 78/2 105/3</p> <p>mentioning [1] 47/14</p> <p>mentions [1] 106/22</p> <p>message [12] 3/10 3/15 3/16 4/5 31/2 34/2 77/9 82/5 85/12 95/14 97/9 114/24</p> <p>messages [12] 22/25 28/22 29/12 29/16 29/17 30/5 30/19 30/20 42/5 84/20 84/25 100/13</p> <p>met [2] 11/14 11/22</p> <p>method [2] 13/2 13/3</p> <p>methods [2] 13/4 13/6</p> <p>Miami [2] 2/4 127/2</p> <p>mid [10] 19/21 26/16 26/20 27/4 27/5 33/12 65/11 65/13 66/6 75/7</p> <p>middle [1] 66/9</p> <p>Midland [1] 7/18</p> <p>might [11] 5/22 6/15 22/22 40/14 44/4 45/22 48/22 70/20 79/12 96/1 114/14</p> <p>Miller [33] 16/21 45/1 55/24 57/3 57/4 59/8 70/25 74/8 74/12 79/4 79/17 80/4 88/9 89/8 89/14 89/15 89/19 90/1 90/5 91/8 91/19 93/2 93/11 94/1 95/9 95/15 98/1 100/5 100/6</p>
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{PLAINTIFF} v.
{DEFENDANT}{WITNESSNAME}
{DATE}

<p>M</p> <p>Miller... [4] 100/25 101/3 101/6 101/18 Miller's [3] 3/21 46/18 46/20 million [3] 13/6 13/9 13/20 mind [3] 51/10 62/16 105/15 mine [2] 63/21 95/8 minute [6] 38/6 44/11 45/4 97/11 115/22 118/13 minutes [5] 11/22 50/2 66/5 97/12 97/18 mischaracterizes [1] 92/3 mischaracterizing [2] 92/7 111/6 misconduct [1] 107/3 mispronounce [1] 11/16 missed [1] 12/16 misstates [1] 36/7 mistakes [1] 92/11 mixing [1] 92/8 mode [1] 67/18 moment [3] 25/5 47/20 103/22 moments [1] 49/12 money [2] 12/9 16/15 month [1] 19/7 months [4] 22/12 25/17 26/5 70/17 morning [1] 5/15 mostly [1] 73/4 motherfucker [1] 97/21 motion [3] 121/19 121/21 122/4 move [9] 8/24 9/4 10/5 41/24 43/5 63/19 63/20 63/22 110/23 moved [1] 43/4 moving [1] 95/7 Mr. [39] 7/22 7/25 8/5 8/13 9/20 10/8 10/18 11/11 29/13 29/19 32/19 32/21 33/2 38/12 41/7 45/16 45/25 60/12 62/11 64/23 67/13 75/24 78/10 78/13 81/3 85/3 87/7 89/19 99/5 105/4 106/22 116/1 116/10 116/23 117/2 118/1 118/17 118/20 120/9 Mr. Blumetti [5] 11/11 29/19 32/19 45/16 75/24 Mr. Eric [2] 32/21 33/2 Mr. Miller [1] 89/19 Mr. Parscale [8] 29/13 38/12 45/25 60/12</p>	<p>78/10 78/13 118/17 120/9 Mr. Parscale's [1] 8/5 Mr. Phillips [1] 105/4 Mr. Trump [2] 81/3 117/2 Mr. Woodward [18] 7/22 7/25 8/13 9/20 10/8 10/18 41/7 62/11 64/23 67/13 85/3 87/7 99/5 106/22 116/1 116/23 118/1 118/20 Mr. Woodward's [1] 116/10 Ms. [6] 26/22 28/25 50/1 75/5 87/15 93/23 Ms. Delgado [5] 26/22 28/25 50/1 75/5 87/15 Ms. Ellis [1] 93/23 multiple [10] 15/6 16/16 16/17 27/10 27/13 39/10 39/23 80/7 92/11 121/12 mute [1] 83/17 muted [1] 67/14</p> <p>N</p> <p>name [13] 7/12 11/16 16/7 16/14 42/18 42/19 55/25 56/10 56/11 57/25 58/2 58/19 103/10 names [4] 42/13 55/1 55/21 102/19 naming [1] 56/12 narrow [1] 37/21 narrowing [1] 38/2 national [1] 55/13 nature [1] 110/11 necessarily [3] 23/5 23/16 76/14 needed [4] 72/4 72/6 88/6 117/21 needs [3] 31/24 65/12 67/5 negative [3] 20/19 47/15 47/19 network [1] 80/8 never [17] 10/21 11/14 19/3 22/20 46/4 52/21 57/11 67/20 92/22 101/6 109/16 113/5 113/17 113/24 114/12 115/15 115/18 news [1] 46/10 nice [5] 50/20 50/20 95/17 123/9 123/11 night [2] 10/18 63/8 nine [1] 96/11 nonresponsive [1] 80/15 nose [1] 83/1 Notary [3] 1/19 5/7 124/14 note [3] 10/17 84/18</p>	<p>126/3 notes [2] 6/15 6/18 nothing [9] 37/24 84/22 98/21 101/1 101/4 108/10 111/16 112/19 113/10 notice [4] 1/20 7/1 7/5 99/9 noticed [1] 5/22 notwithstanding [2] 78/20 99/8 Nucleus [1] 15/10 number [6] 12/12 16/6 45/22 75/20 76/1 96/11 numerous [2] 52/17 53/24 NW [2] 2/19 127/7 NY [1] 2/12</p> <p>O</p> <p>oath [14] 5/3 17/10 47/18 48/10 48/12 49/11 49/17 70/20 85/2 95/3 107/15 109/15 113/4 124/1 object [33] 23/14 23/18 23/21 25/13 26/14 26/15 27/2 28/21 29/3 32/1 38/20 44/11 55/5 60/14 60/16 60/18 68/3 68/4 71/23 72/23 73/23 74/22 78/5 78/15 78/25 88/12 88/22 92/2 93/4 93/13 94/2 97/13 98/11 objecting [3] 22/18 22/20 118/20 objection [44] 17/6 24/21 25/20 26/7 27/2 31/18 34/19 36/5 36/22 46/19 48/1 48/2 48/16 48/25 49/7 49/22 52/8 54/17 54/18 55/4 55/11 55/15 59/19 68/22 79/1 80/2 81/18 87/15 91/4 91/5 91/11 91/13 93/14 99/19 100/9 101/20 101/23 107/19 108/7 108/16 108/22 110/12 111/4 113/18 objections [1] 41/17 obligated [2] 121/19 121/23 obligation [1] 29/7 obstructing [1] 61/4 obstructionist [1] 63/6 obviously [3] 21/17 38/14 67/2 occurred [1] 109/16 October [5] 3/8 21/12 21/19 22/11 24/12 October 2017 [2] 21/12 21/19 offer [1] 25/3 offered [2] 25/3 59/17 office [5] 21/2 55/24</p>	<p>56/9 57/8 58/2 official [1] 124/8 officially [3] 19/12 19/13 57/12 offline [1] 99/2 often [1] 54/15 old [1] 99/25 once [6] 26/24 70/21 78/21 93/3 105/21 127/20 one [51] 13/4 13/5 13/6 15/10 18/20 24/11 27/22 28/4 35/5 35/6 35/19 39/23 42/11 45/11 45/17 51/10 51/20 52/21 55/3 55/14 55/22 56/8 56/8 59/11 67/4 69/1 76/5 77/2 79/12 80/1 80/25 81/20 83/12 85/22 86/3 86/10 86/18 86/20 94/12 96/18 96/19 96/20 99/20 102/20 103/2 109/22 109/24 110/2 110/3 115/22 117/22 one's [1] 18/22 ones [5] 42/6 42/9 56/16 56/20 73/11 ongoing [2] 29/21 29/24 operate [1] 15/6 operations [1] 70/2 opinion [3] 64/25 65/4 112/12 opposed [1] 32/24 oral [1] 120/23 order [6] 10/9 76/25 77/6 107/9 122/14 122/25 ordered [1] 121/8 ordering [2] 127/19 127/20 Org [4] 18/8 18/12 18/13 117/19 organization [4] 17/20 18/3 116/25 117/3 organizations [3] 18/6 68/25 69/4 organized [1] 18/11 original [2] 127/16 127/19 originally [1] 117/14 otherwise [1] 64/18 outlook.com [1] 2/5 overall [1] 18/1 overlooked [1] 61/14 oversaw [1] 68/7 owe [1] 113/10 owed [1] 120/13 own [4] 18/11 81/11 81/11 88/20</p> <p>P</p> <p>p.m [5] 35/5 106/1 106/4 106/7 123/14</p>	<p>PAC [11] 21/13 25/4 25/9 25/19 26/6 31/15 32/10 37/12 43/1 44/1 116/22 page [7] 3/6 3/24 24/4 95/24 106/10 126/3 126/6 paid [5] 11/2 11/4 18/12 88/10 88/14 papers [1] 103/21 paragraphs [1] 106/14 PARSCALE [27] 1/17 3/2 3/7 3/21 4/3 5/8 5/15 7/14 23/11 29/13 38/12 45/25 51/25 52/3 52/12 53/2 60/12 78/10 78/13 105/25 118/17 120/9 124/5 126/1 126/22 127/5 127/11 Parscale's [2] 3/19 8/5 part [5] 44/22 71/8 105/25 108/3 116/25 particular [1] 76/16 parties [2] 125/12 127/20 parties' [1] 125/13 partner [2] 89/2 89/6 parts [1] 20/7 party [7] 12/3 12/7 23/4 65/2 98/24 119/20 127/19 pass [1] 84/18 past [1] 38/14 pat [1] 12/16 pause [2] 65/8 77/10 pay [5] 88/18 89/13 89/15 95/9 117/3 paying [9] 7/22 89/14 116/5 116/10 116/11 116/12 116/15 116/23 117/18 payroll [3] 88/24 88/25 90/3 Pearson [2] 59/12 72/11 penalties [1] 126/19 people [23] 27/10 27/13 47/8 55/17 56/12 56/13 58/19 58/20 58/22 58/22 70/19 73/7 73/9 80/7 81/5 85/17 90/7 90/9 90/9 92/11 92/15 92/23 117/5 people's [1] 92/10 per [2] 120/1 125/7 percent [4] 18/1 107/16 113/10 117/20 performance [1] 37/10 period [7] 13/14 13/24 14/7 14/10 16/10 60/6 60/13 perjury [1] 126/19 permitted [2] 9/3 37/14 person [8] 5/24 28/13 39/19 69/13 71/19</p>
--	--	--	---	---

<p>P</p> <p>person... [3] 83/15 91/25 110/4</p> <p>personal [8] 39/12 40/4 48/22 49/4 104/3 104/8 104/25 105/1</p> <p>pertained [4] 37/3 37/7 40/11 46/12</p> <p>pertaining [2] 38/19 40/13</p> <p>Phillips [4] 3/18 87/3 87/6 105/4</p> <p>phone [6] 5/25 21/12 42/7 42/9 78/14 79/12</p> <p>phrase [1] 91/7</p> <p>physically [1] 5/5</p> <p>pinnacle [1] 63/7</p> <p>pissed [2] 81/22 95/13</p> <p>place [1] 35/23</p> <p>placed [2] 49/20 67/17</p> <p>placing [1] 93/1</p> <p>Plaintiff [3] 1/6 2/3 2/7</p> <p>plan [1] 10/20</p> <p>plane [1] 103/8</p> <p>PM [1] 1/14</p> <p>pmcpartland [1] 2/13</p> <p>point [6] 17/24 44/2 47/11 61/4 61/8 86/7</p> <p>Politico [1] 44/20</p> <p>portion [2] 61/23 62/10</p> <p>posed [3] 9/1 65/11 67/16</p> <p>position [20] 25/4 25/17 36/2 53/19 59/18 65/25 93/2 95/2 98/23 99/1 99/4 100/25 101/4 107/17 109/15 113/16 113/24 115/7 115/14 118/2</p> <p>positive [4] 20/19 47/15 47/19 48/9</p> <p>possession [2] 29/18 30/6</p> <p>possibly [2] 42/17 86/3</p> <p>post [1] 100/17</p> <p>potential [2] 37/25 40/7</p> <p>Powers [1] 70/1</p> <p>pregnant [1] 46/10</p> <p>prepare [1] 11/8</p> <p>prepared [1] 64/12</p> <p>present [2] 5/6 98/25</p> <p>president [6] 1/8 16/22 73/8 73/10 73/22 92/17</p> <p>pretty [1] 21/2</p> <p>prevent [2] 48/23 49/5</p> <p>previously [5] 3/15 17/2 73/22 76/2 82/10</p> <p>priveledged [1] 61/2</p> <p>privilege [37] 3/13 8/2 8/7 8/15 8/22 9/2 9/11 9/25 10/3 36/24 37/4 37/18 41/8 41/8 41/14 41/15 41/19 51/15</p>	<p>52/17 61/7 87/10 99/7 99/19 112/17 118/22 119/2 119/10 119/13 119/14 119/25 120/6 120/13 120/21 120/23 121/18 121/23 122/3</p> <p>privileged [12] 9/13 37/15 40/16 42/1 63/13 64/6 108/16 108/17 108/19 109/4 119/12 119/24</p> <p>pro [3] 2/3 2/7 66/18</p> <p>probe [4] 49/21 104/3 118/21 119/12</p> <p>problem [3] 92/10 92/16 118/12</p> <p>problems [4] 90/15 90/20 92/15 94/5</p> <p>Procedure [1] 125/8</p> <p>proceed [1] 64/15</p> <p>proceeding [1] 64/14</p> <p>process [1] 71/8</p> <p>produce [7] 23/10 29/8 29/17 99/10 101/5 120/15 121/6</p> <p>produced [19] 3/13 22/21 23/6 23/8 23/20 28/23 28/24 29/4 29/12 29/16 30/3 30/4 32/20 51/15 75/23 105/2 114/25 120/21 121/1</p> <p>production [4] 23/3 75/24 76/10 76/14</p> <p>Professionally [1] 15/4</p> <p>profit [3] 12/14 12/19 12/23</p> <p>promise [1] 16/14</p> <p>promote [1] 16/15</p> <p>property [2] 14/9 14/9</p> <p>protective [3] 76/25 122/13 122/25</p> <p>provide [12] 7/2 57/8 94/23 117/12 119/1 119/10 119/14 119/24 121/18 121/19 121/23 122/3</p> <p>provided [1] 94/13</p> <p>providing [1] 52/25</p> <p>prowess [1] 17/15</p> <p>public [5] 1/19 14/15 14/22 14/24 124/14</p> <p>publicized [1] 13/5</p> <p>purchases [1] 14/22</p> <p>pursuant [2] 1/20 5/2</p> <p>put [9] 33/16 47/23 67/13 74/25 75/14 75/15 90/3 96/1 106/3</p> <p>Q</p> <p>questions [11] 8/18 10/6 23/22 40/19 41/1 60/15 60/24 62/25 63/16 100/18 120/9</p> <p>quick [2] 33/8 33/14</p> <p>quickly [1] 44/23</p>	<p>quite [1] 10/19</p> <p>quote [5] 27/4 47/24 52/18 57/7 85/25</p> <p>R</p> <p>railing [1] 73/8</p> <p>rails [1] 66/8</p> <p>raise [1] 15/23</p> <p>rake [1] 86/13</p> <p>ran [2] 59/11 59/25</p> <p>range [1] 16/5</p> <p>re [10] 3/19 3/21 95/8 95/12 95/25 96/5 96/17 96/23 97/11 127/10</p> <p>re-tweet [2] 3/19 3/21</p> <p>re-tweeted [3] 95/25 96/17 97/11</p> <p>re-tweeting [4] 95/8 95/12 96/5 96/23</p> <p>reached [1] 63/7</p> <p>reaction [1] 46/10</p> <p>reactions [2] 46/17 47/6</p> <p>reading [10] 24/8 43/18 43/22 78/17 79/10 83/16 105/14 105/24 127/14 128/3</p> <p>real [6] 14/9 16/9 16/11 18/10 34/21 89/11</p> <p>realize [2] 66/16 66/17</p> <p>really [10] 19/3 19/11 20/20 43/21 48/6 62/20 62/22 92/18 95/12 115/10</p> <p>Realty [1] 18/11</p> <p>reason [19] 6/12 31/15 48/21 48/23 61/9 61/25 62/16 64/8 65/20 76/17 77/4 77/5 80/3 82/23 88/3 110/15 111/2 111/13 126/6</p> <p>reasonable [1] 127/18</p> <p>reasons [5] 43/25 56/15 81/1 86/3 109/3</p> <p>recalling [1] 39/5</p> <p>recap [1] 116/1</p> <p>recapping [1] 78/13</p> <p>receipt [1] 127/17</p> <p>receive [6] 15/14 29/22 29/25 55/14 117/12 120/6</p> <p>received [5] 18/6 89/19 95/15 97/10 127/20</p> <p>receiving [4] 16/20 29/20 107/10 115/7</p> <p>recently [3] 44/18 45/13 103/20</p> <p>Recess [2] 50/8 115/24</p> <p>recircle [1] 43/7</p> <p>recognize [1] 23/1</p> <p>recollection [9] 24/19 31/17 43/24 77/22 78/3 78/11 109/18 109/20 115/17</p> <p>recommendation [1]</p>	<p>94/13</p> <p>recommending [1] 95/1</p> <p>record [33] 7/13 7/16 10/17 10/23 14/15 14/22 22/23 26/18 27/12 31/24 62/6 66/13 66/14 66/22 66/23 67/12 67/23 83/20 98/22 99/20 105/21 118/7 118/13 118/14 118/16 119/4 119/9 120/17 121/11 122/7 123/12 125/6 127/25</p> <p>records [2] 18/14 88/25</p> <p>redacted [1] 104/24</p> <p>redemption [3] 92/13 92/24 93/1</p> <p>reduced [1] 78/21</p> <p>reed [1] 82/7</p> <p>reference [4] 16/7 53/3 78/20 78/22</p> <p>referenced [3] 107/4 107/13 109/17</p> <p>referring [3] 31/14 94/9 108/15</p> <p>reflect [1] 83/21</p> <p>refresh [7] 24/18 31/16 34/12 77/21 78/3 78/10 85/13</p> <p>refusing [1] 95/9</p> <p>regard [1] 127/18</p> <p>regarding [10] 24/19 37/24 43/25 49/5 68/21 91/19 100/14 100/24 100/25 118/17</p> <p>rehired [1] 72/17</p> <p>reintroduce [1] 45/23</p> <p>relate [2] 63/17 64/20</p> <p>related [4] 40/14 40/22 46/9 63/1</p> <p>relationships [4] 80/5 112/7 120/2 120/4</p> <p>relative [2] 125/11 125/12</p> <p>relayed [2] 88/4 115/15</p> <p>relevance [4] 62/14 79/1 93/14 94/3</p> <p>relevant [12] 8/3 8/4 9/15 23/13 29/15 61/13 62/23 64/10 64/17 64/24 64/25 65/3</p> <p>relying [1] 87/5</p> <p>remember [131]</p> <p>remembered [1] 115/18</p> <p>remembers [1] 109/6</p> <p>remind [1] 24/23</p> <p>Remote [1] 1/11</p> <p>remotely [8] 5/10 61/2 61/6 63/12 63/13 64/10 65/2 124/5</p> <p>renew [2] 62/13 122/15</p> <p>repeat [7] 14/16 14/19</p>	<p>21/7 67/10 67/19 67/22 88/16</p> <p>repeated [1] 97/1</p> <p>rephrase [10] 6/21 38/8 42/24 48/8 52/9 55/10 97/15 98/14 101/22 110/13</p> <p>replied [1] 16/23</p> <p>reply [1] 24/15</p> <p>report [2] 94/9 125/5</p> <p>reporter [12] 1/19 31/21 44/19 61/21 62/9 66/21 123/12 124/13 125/4 125/18 126/24 127/24</p> <p>Reporting [1] 127/1</p> <p>represent [2] 7/23 31/13</p> <p>representation [1] 11/3</p> <p>republican [2] 12/3 12/7</p> <p>request [3] 29/2 29/11 125/8</p> <p>requested [5] 7/9 23/7 61/23 62/10 119/1</p> <p>requesting [1] 7/2</p> <p>require [1] 120/23</p> <p>required [2] 119/18 121/7</p> <p>requiring [1] 94/11</p> <p>reread [1] 87/8</p> <p>reside [1] 7/15</p> <p>respect [1] 66/19</p> <p>respected [1] 17/15</p> <p>respond [4] 97/24 108/14 109/1 109/1</p> <p>response [3] 3/21 29/2 106/4</p> <p>responsive [6] 29/3 29/11 29/20 119/19 120/11 120/12</p> <p>rest [1] 76/19</p> <p>restate [2] 43/13 75/4</p> <p>restrict [1] 104/4</p> <p>return [1] 127/15</p> <p>reveal [1] 37/18</p> <p>revealed [1] 41/13</p> <p>revenue [4] 12/14 12/19 12/25 15/14</p> <p>reviewing [2] 77/12 82/18</p> <p>ridiculous [1] 67/9</p> <p>ring [6] 70/1 95/23 95/24 107/6 107/7 107/8</p> <p>rings [1] 46/9</p> <p>risk [1] 81/10</p> <p>RNC [1] 58/24</p> <p>Rodger [1] 77/24</p> <p>roll [1] 62/3</p> <p>room [12] 20/23 48/11 54/9 54/11 54/12 54/16 54/25 58/19 58/23 58/25 93/25 108/1</p>
--	--	---	---	---

{PLAINTIFF} v.
{DEFENDANT}{WITNESSNAME}
{DATE}

R	89/9 September [1] 124/15 seriously [1] 66/18 serve [1] 103/21 served [1] 99/9 services [5] 17/5 53/1 116/5 116/11 117/13 several [1] 55/8 shaking [2] 21/20 31/23 shaky [1] 12/15 share [10] 20/13 22/4 44/16 95/20 95/25 97/3 103/12 103/18 104/22 114/20 shares [1] 104/1 sharing [8] 6/2 28/11 28/16 28/17 44/15 88/8 98/19 104/16 sheet [4] 126/4 126/5 127/13 127/15 shortly [1] 97/16 shot [3] 3/16 82/6 97/9 showed [2] 45/11 73/18 showing [3] 24/16 30/18 33/18 shows [1] 74/16 sic [1] 11/17 sign [4] 76/25 125/9 126/4 127/14 Signature [1] 128/5 significant [1] 14/8 significantly [1] 16/12 signing [1] 128/3 similar [1] 34/18 simply [2] 61/14 97/1 Simultaneous [60] 9/6 12/17 13/12 15/5 19/17 23/9 23/15 26/8 26/25 33/15 35/8 35/24 36/4 38/4 39/2 39/25 40/24 56/3 57/21 58/6 59/15 61/15 62/4 62/21 63/18 64/2 65/15 69/6 69/16 70/12 71/14 73/13 74/3 76/8 76/12 80/9 80/12 80/16 82/21 83/11 83/19 83/23 84/15 85/9 101/10 103/1 109/11 111/5 111/20 112/24 113/2 113/22 118/5 120/16 121/10 121/15 122/5 122/8 122/17 123/2 Sincerely [1] 127/21 single [2] 82/5 114/10 sit [1] 56/19 sitting [2] 49/13 100/16 situation [3] 39/11 47/8 119/22 six [2] 13/24 36/14 skylar [2] 2/21 127/9 sleezy [1] 74/13	small [2] 51/5 93/16 snuck [1] 103/8 so-called [1] 73/9 software [1] 15/7 Sollenberger [1] 77/24 solve [2] 90/14 90/19 someone [13] 16/6 48/13 65/1 70/21 71/16 73/18 85/1 91/1 102/8 116/11 116/12 116/15 116/15 sometimes [2] 15/22 104/14 somewhere [2] 70/8 76/1 son [1] 95/10 sorry [57] 11/6 11/15 12/15 14/18 18/2 21/7 21/20 27/24 28/7 31/9 32/4 34/8 34/14 34/20 34/21 34/24 35/2 35/11 35/13 35/17 36/24 40/2 43/17 44/7 44/12 52/4 52/15 55/7 55/23 59/11 60/5 60/19 70/16 77/15 78/6 80/11 80/14 80/20 83/5 84/21 84/23 88/16 88/16 90/2 90/17 90/23 94/17 96/18 96/19 101/9 102/22 103/25 104/13 109/23 114/9 116/14 118/6 sotto [3] 78/17 79/10 95/19 sound [1] 93/5 sounds [3] 24/16 24/17 104/14 soured [1] 111/19 SOUTHERN [3] 1/2 120/1 120/22 speakers [60] 9/6 12/17 13/12 15/5 19/17 23/9 23/15 26/8 26/25 33/15 35/8 35/24 36/4 38/4 39/2 39/25 40/24 56/3 57/21 58/6 59/15 61/15 62/4 62/21 63/18 64/2 65/15 69/6 69/16 70/12 71/14 73/13 74/3 76/8 76/12 80/9 80/12 80/16 82/21 83/11 83/19 83/23 84/15 85/9 101/10 103/1 109/11 111/5 111/20 112/24 113/2 113/22 118/5 120/16 121/10 121/15 122/5 122/8 122/17 123/2 speaking [1] 42/15 specific [3] 29/11 49/12 72/25 specifically [4] 25/24 40/11 49/16 59/1 specifics [1] 20/14 speed [4] 31/13 86/11	86/14 101/25 spend [1] 8/16 spending [1] 74/12 spent [1] 93/15 spoken [5] 36/17 37/6 67/15 98/1 117/25 staff [1] 89/18 staffer [1] 93/11 stamp [2] 75/25 76/6 stamped [6] 23/21 28/24 32/24 33/1 33/3 45/15 standard [2] 41/18 119/17 STANLEY [5] 2/18 7/20 11/10 36/24 127/6 start [2] 17/1 105/5 started [2] 19/12 19/13 starting [2] 63/8 106/7 state [10] 1/19 5/6 7/12 7/17 26/17 98/22 99/19 124/2 124/14 124/17 STATES [1] 1/1 stating [4] 9/2 16/21 108/15 109/4 Statute [1] 127/18 staying [1] 17/22 Stenographic [4] 1/19 124/13 125/18 127/24 stenographically [1] 125/5 Steve [1] 56/8 still [15] 9/16 12/1 29/20 36/2 38/20 41/25 60/16 62/19 66/22 83/15 95/23 105/11 116/2 116/4 118/1 stipulation [1] 5/2 stop [9] 28/10 44/15 63/21 66/8 70/6 88/8 97/3 98/19 104/16 stopping [1] 65/13 story [5] 17/2 110/16 111/3 111/14 115/16 stream [4] 3/9 30/1 30/14 33/6 Street [4] 2/11 2/19 127/1 127/7 strike [1] 80/15 string [4] 3/15 33/24 77/9 104/25 strongly [1] 41/23 struggling [1] 80/6 stuff [2] 92/21 102/13 stupid [1] 17/11 style [1] 80/6 styled [2] 1/21 127/13 subject [3] 53/15 112/19 126/20 subjected [1] 107/5 subordinate [2] 91/2 91/9 substance [1] 126/20 suddenly [4] 21/18 25/18 26/4 78/21	sued [1] 109/13 suggest [3] 10/5 41/23 54/4 suggested [4] 87/7 90/5 90/7 127/16 suggesting [1] 81/8 suing [4] 73/5 85/17 85/22 87/25 Suite [1] 127/1 summer [6] 70/8 70/25 72/3 87/4 91/16 114/6 support [4] 12/3 12/4 12/6 29/9 supporter [1] 12/2 supposed [3] 73/1 84/10 122/2 suring [1] 73/6 surprised [1] 105/2 surrogate [2] 56/1 56/23 survive [1] 14/3 suspicion [2] 90/22 90/24 suspicious [2] 91/24 92/18 SW [1] 2/3 sworn [2] 5/10 124/6 sympathize [1] 119/7 synopsis [1] 17/11
S	Sarah [3] 56/11 57/7 59/5 sat [1] 58/2 save [1] 43/6 saving [2] 84/20 84/24 savviness [1] 86/19 savvy [2] 28/13 44/15 saw [3] 10/9 24/3 45/16 schedule [1] 119/7 screen [26] 3/16 6/2 22/4 28/16 30/8 33/17 33/18 33/22 44/16 44/17 50/21 67/13 67/14 67/17 82/6 83/7 86/13 94/10 95/6 95/18 95/21 95/25 97/9 103/18 104/22 114/20 screens [1] 6/5 se [3] 2/3 2/7 66/19 seal [1] 124/8 seamless [1] 6/3 Seat [1] 58/16 second [6] 12/16 82/7 83/12 86/20 115/2 118/16 seconds [1] 121/17 see [31] 22/14 23/5 24/2 30/7 30/16 30/19 31/2 32/14 43/21 44/23 45/2 51/4 51/6 52/16 52/20 53/24 55/19 64/6 65/18 76/17 77/3 77/5 82/8 83/1 83/6 83/15 86/10 86/23 88/8 105/20 119/8 seeing [4] 6/5 105/15 123/9 123/11 seeking [1] 72/7 selectively [1] 29/16 selling [1] 13/25 send [5] 10/19 29/6 63/9 98/9 98/16 senior [1] 54/15 sense [3] 6/24 65/25 105/6 sent [3] 10/18 10/22 97/9 separated [2] 18/11			
T				talented [2] 27/15 94/22 talks [1] 79/3 tape [1] 62/3 team [2] 24/13 116/18 tech [4] 28/13 44/15 86/19 86/19 technology [1] 15/7 Telephone [1] 2/12 Telephone:202 [2] 2/20 127/8 Telephone:202-302-70 49 [2] 2/20 127/8 Telephone:305 [1] 2/4 Telephone:305-510-34 00 [1] 2/4 temporarily [1] 63/5 ten [6] 11/22 13/9 22/12 25/17 26/5 121/17 Tennessee [1] 125/3 term [1] 73/9 terminated [3] 31/15 43/1 43/25 termination [2] 32/10 37/13 terms [1] 23/6 testament [1] 30/1 testified [2] 5/10 69/5 testify [3] 87/13 87/23 103/21 testimony [6] 6/14 50/12 50/17 92/4 111/7 125/7

{PLAINTIFF} v.
{DEFENDANT}{WITNESSNAME}
{DATE}

T	3/14 4/5 11/13 12/10 15/12 15/15 15/17 16/3 16/8 17/3 17/8 17/20 18/3 18/5 18/7 18/8 18/10 18/13 28/4 32/9 32/21 33/24 36/3 36/11 39/14 40/22 44/24 46/11 46/13 46/15 46/16 47/4 47/14 47/18 47/23 48/15 49/19 51/15 52/5 52/11 52/19 53/1 53/2 53/3 53/6 53/6 53/14 54/3 74/13 79/23 80/5 81/3 81/22 92/17 100/24 101/3 101/7 101/13 103/8 104/5 107/5 107/13 108/2 109/9 109/13 110/16 112/7 113/12 113/16 113/24 114/12 116/22 116/22 117/2 117/17 117/19 126/1 127/10 Trump's [6] 12/2 12/5 16/21 33/3 46/10 52/6 Trumps [1] 44/24 trust [4] 41/7 90/15 90/20 90/21 truth [1] 113/4 truthful [1] 111/19 try [6] 15/7 50/6 51/8 59/1 92/19 118/16 trying [16] 14/2 15/1 35/12 40/16 43/6 46/23 49/14 62/18 64/19 86/13 94/10 95/7 96/19 103/20 104/3 119/6 turn [2] 86/18 105/17 turned [1] 67/9 TV [7] 20/10 20/16 37/11 42/20 42/21 47/24 49/20 tweet [9] 3/19 3/20 3/21 86/12 95/8 95/11 95/24 96/16 97/11 tweeted [3] 95/25 96/17 97/11 tweeting [4] 95/8 95/12 96/5 96/23 tweets [1] 100/5 twice [2] 5/23 93/8 Twitter [3] 37/10 38/22 38/25 two [17] 6/5 10/4 10/11 10/16 13/4 22/11 30/19 30/20 49/15 79/24 80/1 92/8 100/22 115/21 115/22 118/9 121/12 two-minute [1] 115/22	48/12 49/11 49/17 63/14 70/20 80/3 85/2 95/3 107/15 109/15 113/4 116/12 117/1 120/13 122/13 122/25 126/19 127/18 underbidding [1] 16/12 undersigned [1] 124/4 unfortunately [1] 39/13 UNITED [1] 1/1 unless [4] 8/6 62/18 99/19 122/10 unmuted [1] 67/18 unnecessarily [1] 121/22 unpack [1] 64/22 unquote [3] 27/4 47/24 86/1 unusual [1] 53/2 up [39] 8/24 15/1 15/2 16/8 16/11 23/17 24/15 31/13 44/17 49/2 51/23 51/23 52/14 53/24 68/16 69/8 74/16 75/20 79/16 86/11 86/14 93/23 94/10 95/6 95/18 101/25 104/1 105/9 105/23 106/5 106/17 110/11 110/16 111/3 111/13 111/16 111/18 115/23 121/22 upset [1] 115/11 urging [1] 47/23 utilized [1] 29/22	Waiver [1] 128/1 waiving [5] 76/4 76/15 76/18 76/24 82/11 Wall [1] 2/11 WALTON [2] 124/3 125/2 war [8] 20/22 54/9 54/16 54/25 58/19 58/22 58/25 93/25 Washington [2] 2/19 127/7 water [2] 6/13 67/3 website [3] 16/11 16/16 17/19 websites [1] 16/17 week [2] 19/14 120/6 weeks [3] 34/22 35/2 35/15 whatever's [1] 74/23 White [13] 47/13 47/16 55/2 55/14 56/10 56/14 57/4 59/13 59/17 79/19 80/7 90/7 90/9 whole [4] 24/25 30/21 32/25 106/11 wife [1] 52/6 William [1] 95/10 winning [1] 16/12 withstanding [1] 92/25 witness [14] 2/22 3/1 5/5 5/9 23/4 26/16 26/23 27/3 64/20 69/4 112/21 124/8 125/7 125/8 witness's [2] 110/20 112/13 woman [2] 16/7 66/17 women [5] 93/2 101/16 102/2 102/17 107/4 WOODWARD [30] 2/18 2/18 7/20 7/22 7/25 8/13 9/20 10/8 10/18 26/16 26/19 41/7 62/11 64/23 66/15 67/13 83/13 84/5 85/3 87/6 87/7 99/5 105/3 106/22 116/1 116/23 118/1 118/20 127/6 127/6 Woodward's [2] 116/10 117/18 word [2] 34/20 34/24 wording [1] 34/18 words [3] 72/13 89/4 123/6 works [2] 58/10 62/5 world [3] 39/14 104/5 112/7 worth [2] 16/15 85/19 wrap [1] 115/23 write [2] 24/12 32/4 writing [3] 42/5 78/7 78/21 written [1] 120/24 wrongdoing [2] 108/11 108/11	wrote [2] 34/14 107/6 X XYZ [1] 114/13 Y year [15] 17/23 18/19 18/20 18/21 18/21 18/22 19/7 39/8 69/9 74/13 79/9 83/3 84/3 85/5 109/8 years [8] 13/23 13/24 18/24 36/14 39/10 99/16 114/7 117/15 yesterday [2] 10/10 29/19 YORK [5] 1/2 2/12 54/7 120/2 120/22 Z zoom [4] 28/14 51/5 83/8 105/7 zooming [1] 51/8
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